



City of Melbourne Amendment C405melb—Punt Road Oval

Statement of Evidence

Prepared by Dr Christina Dyson

26 September 2022

Instructed by the City of Melbourne



Acknowledgement of Country

We respect and acknowledge the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation, their lands and waterways, their rich cultural heritage and their deep connection to Country, and we acknowledge their Elders past and present. We are committed to truth-telling and to engaging with Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation to support the protection of their culture and heritage. We strongly advocate social and cultural justice and support the Uluru Statement from the Heart.

Quality assurance

The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

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1 Introduction

1.1 Purpose

- 1 I, Christina Rose Dyson, have prepared this statement of evidence for the City of Melbourne in relation to Amendment C405melb to the Melbourne Planning Scheme (the Amendment).
- 2 The land affected by the Amendment of relevance to this statement is the Punt Road Oval and a small section of land to the southeast of the Punt Road Oval, East Melbourne.
- 3 The Amendment proposes to implement the recommendations of the Punt Road Oval (Richmond Cricket Ground) Heritage Review October 2021, Context (now GML Heritage) on a permanent basis by
 - applying an individual Heritage Overlay to the Punt Road Oval (Richmond Cricket Ground) and a small section of Yarra Park to the southeast of the Oval, and to introduce a new statement of significance for the place;
 - including a statement of significance for Punt Road Oval (Richmond Cricket Ground) as an incorporated document to the Planning Scheme;
 - amending the boundary of HO2 East Melbourne & Jolimont Precinct Heritage Overlay to remove the Punt Road Oval and small section of Yarra Park to the southeast of the Oval.

1.2 Instructions

- 4 I prepared this statement of evidence in response to instructions from the City of Melbourne as set out in the Brief to Expert – Heritage for Amendment C405melb to the Melbourne Planning Scheme.
- 5 I was instructed to prepare an expert evidence statement in respect to the Amendment as it relates to Punt Road Oval, and be available to give evidence in the week of 3 October 2022.

1.3 Sources of information

- 6 In preparing this statement I have relied upon the *Punt Road Oval (Richmond Cricket Ground) Heritage Review October 2021, Context* (now GML Heritage).

The Review was prepared by a small team of consultants at Context. I was the project lead.

1.4 Qualifications, experience and area of expertise

- 7 PhD (University of Melbourne); Grad Dip (Hort) (Burnley, University of Melbourne); BA (Hons) (University of Sydney); M.ICOMOS.
- 8 I have been working in cultural heritage for over 20 years. I have worked at Context (now GML Heritage) in 2006–09 and from 2015 to the present, and am a Senior Associate of that company. I have led and been the primary author of a diverse range of projects for both built heritage and landscape heritage places, and for complex places that combine built form and landscape heritage.
- 9 I completed my doctorate at the University of Melbourne (Melbourne School of Design) in 2015. As a PhD scholar and recently (2021) I presented guest lectures on cultural heritage for masters and undergraduate courses in the Faculty of Architecture Building and Planning.
- 10 Before joining Context in 2006 I worked as a heritage consultant in Sydney with Godden Mackay Logan (now GML Heritage). In this role I was involved in heritage assessments, heritage impact assessments, conservation management plans, and high-level strategic heritage projects.
- 11 I was a Director of the National Trust of Australia (Victoria) from November 2015 to February 2021. In that role I was also involved in following committees: Building and Estates Committee (Chair, 2015–February 2021); Heritage Committee (Deputy Chair, 2015–2021); Cultural Collections, Interpretation and Programming Committee (member 2015–2019).
- 12 I chair the Victoria’s Heritage Restoration Fund Committee of Management (VHRF) (2016–).
- 13 I am an Honorary Life Member of the Australian Garden History Society (AGHS). From 2008–2015 I co-edited the AGHS’s quarterly journal *Australian Garden History* with Richard Aitken. I have recently been invited to serve on the AGHS’s Kindred Spirits Fund Committee (February 2021).
- 14 I am a Full International Member of Australia ICOMOS (since August 2005).

Statement of expertise

- 15 My area of expertise of relevance to this Planning Panel is the assessment of cultural heritage significance of built form, precincts, historic trees and landscapes in the Melbourne metropolitan area and regional Victoria, with

reference to the current accepted heritage significance criteria and within the framework local historical themes.

- 16 I have been retained by a number of local councils to appear as an expert witness on heritage-related matters at independent planning panels and at VCAT, including for the City of Melbourne, City of Boroondara, City of Casey, Mornington Peninsula Shire, and Yarra Ranges Shire.
- 17 As a senior cultural heritage practitioner I have contributed to and led many municipal heritage reviews, including the Hoddle Grid Heritage Review, parts of the Municipal Wide Heritage Gap Study for the City of Boroondara (for Kew, Hawthorn, Kew East and Hawthorn East), smaller-scaled Heritage Reviews for the City of Boroondara (Wattle Road Hawthorn, Balwyn Peer Review), Elwood HO8 Heritage Review Stage 1 (City of Port Phillip), the Mildura Part B Heritage Study Stage 1, and the Moonee Valley Heritage Study. I am currently leading the delivery of the Mildura Part B Heritage Study Stage 2.
- 18 I also specialise in landscape heritage, which encompasses historic gardens, parks and reserves including sporting grounds, designed landscapes and cultural landscapes.
- 19 My curriculum vitae outlining my heritage qualifications and experience is attached as Appendix A to this report.

1.5 Summary of opinion

- 20 The Amendment seeks to add Punt Road Oval (Richmond Cricket Ground) as an Individually Significant place to the Heritage Overlay and should be supported. The inclusion of Punt Road Oval (Richmond Cricket Ground) is justified by the citation prepared by me and my Context colleagues for the City of Melbourne, October 2021.
- 21 The citation for this place determines that the Punt Road Oval (Richmond Cricket Ground) meets the 'threshold' of local significance, based on an assessment of its heritage value using the recognised HERCON Criteria.

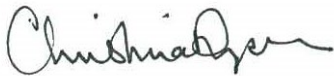
1.6 Further changes recommended in response to submissions

- 22 I recommend that changes be made to the heritage citation and statement of significance as noted in Section 5.4 of this Statement of Evidence, and as set out in the revised Statement of Significance.

1.7 Declaration

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

Signed,

A handwritten signature in black ink, appearing to read 'Christina Dyson', written in a cursive style.

Christina Dyson

2 Background and limitations

2.1 Introduction

- 24 In June 2021 Melbourne City Council engaged Context (now GML Heritage Victoria) to carry out a heritage review of the Punt Road Oval (Richmond Cricket Ground). Context was re-engaged in September 2021 following a review of the citation for Punt Road Oval (Richmond Cricket Ground) by the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation.
- 25 The findings of the Review were intended to support a future Planning Scheme Amendment, administered under the Victorian *Planning and Environment Act 1987*.
- 26 The purpose of the project was to undertake a full heritage review of the Punt Road Oval (Richmond Cricket Ground). The Review also considered Punt Road Oval (Richmond Cricket Ground) within the context of HO2 East Melbourne & Jolimont Precinct.

2.2 Background

- 27 The Richmond Cricket Ground & Pavilion, Yarra Park (the place referred to as Punt Road Oval (Richmond Cricket Ground) in the current Heritage Review), was previously assessed in the East Melbourne & Jolimont Conservation Study, 1983. The place was afforded protection following implementation of the recommendations of the East Melbourne and Jolimont Conservation Study from the 1980s. It is located with Heritage Overlay HO2 East Melbourne & Jolimont Precinct.
- 28 It was previously included in the City of Melbourne's Heritage Places Inventory as a C-graded building with no streetscape grading. The C Grading was restored in Amendment C414 (gazetted 11/11/2022).
- 29 Through a previous amendment (*Amendment C258 Heritage Policies Review and West Melbourne Heritage*) the heritage grading for the Richmond Cricket Ground and Pavilion should have been converted from the previous A to D system to a contemporary Significant, Contributory, Non-Contributory category system and included in the Heritage Places Inventory. However, it was omitted from Amendment C258 in error.
- 30 Heritage consultants Lovell Chen undertook the Amendment C258 heritage grading conversion. The Richmond Cricket Ground & Pavilion was included in the

- spreadsheet of properties given to Lovell Chen as part of the desktop review for Amendment C258, listed as Punt Road Oval with a building grading of C. Attachment 4 to Lovell Chen’s expert evidence to the Amendment C258 Panel shows that Lovell Chen reviewed the building category as Significant and that they noted that it has been ‘Associated with Richmond Cricket Club since the mid-1850s, and with the Richmond Football Club (home of the Tigers) since the 1880s. Of historical and social significance. Also has an Edwardian grandstand’.
- 31 The City of Melbourne undertook a follow-up amendment to Amendment C258 called *Amendment C396 Finalisation of the Heritage Places Inventory* (gazetted 7/07/2022). The Richmond Cricket Ground and Pavilion was also not included in Amendment C396 in error.
- 32 Context completed the Review on 30 July 2021 in accordance with the initial request from the City of Melbourne to carry out a Heritage Review of the Punt Road Oval (Richmond Cricket Ground).
- 33 Context updated the Review in October 2021. The purpose of the update was to incorporate changes requested by the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation following their review of the 30 July 2021 Citation for Punt Road Oval (Richmond Cricket Ground).

2.3 Limitations

- 34 The Heritage Review was well researched, carried out with rigour, and provides a solid foundation for its conclusions and recommendations. I stand by the findings and recommendations of the Review, noting the following limitations:
- COVID-19 government health restrictions impacted the ability to carry out some historical archival research. This meant we were unable to look at the Reserve file held by the Department of Environment, Land, Water and Planning (DELWP) at their Knox office because visitors were not permitted in the office and all staff were working remotely.
 - At the commencement of the Review, the City of Melbourne made contact with Richmond Football Club (via phone and email) to request access to the Punt Road Oval. Permission from Richmond Football Club to access the site did not eventuate. The site investigations were therefore limited to the public realm.
 - The available timeframe for the Review did not allow for an assessment of Aboriginal cultural values or a comprehensive assessment of social values.

3 Methodology of the study

3.1 Introduction

- 35 The Review was led by me, with my colleagues contributing sections relevant to their expertise: historian Dr Helen Doyle prepared the contextual and place histories with research assistance from Sophia Hanger; Dr Doyle prepared the associative and social values assessment; architect Dr Kim Roberts considered the architectural significance of the buildings with assistance from Juliet Berry.
- 36 The methodology for the Review considered the relevant planning context of the Melbourne Planning Scheme, and other best-practice heritage guidelines and principles, including:
- Planning Practice Note 1 'Applying the Heritage Overlay' (DELWP, August 2018) (PPN01)
 - The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013 (the Burra Charter) and
- 37 A full list of sources used in the Review is included in the Punt Road Oval Heritage Review report.
- 38 The Review drew upon information gathered about the physical place and its setting from site inspections (external areas only) from the public domain, in June and July 2021.
- 39 During the assessment stage, site inspections were carried out by me, Dr Kim Roberts and Juliet Berry.

3.2 Historical research

- 40 A contextual history and place history were prepared for the Punt Road Oval. Historical research drew on accessible primary and secondary resources—for example, public records, historical maps and images, online sources, published sources. The aim of the research was to:
- determine the reservation date and details for the sporting ground
 - clarify the site name
 - determine an establishment date for the oval
 - determine build dates for the stands and other structures and/or key phases of development

- determine owners, builders or architects at key development stages, if possible
 - determine any significant associations
 - clarify extent of changes
 - determine the historical themes the place is connected to.
- 41 A wide range of general history sources and local history sources were consulted as part of the Review. This included published sources (both primary and secondary resources), but also archival material. The chief holdings consulted included State Library Victoria (books, maps and plans, historical photographs; other digitised records, Victorian Government Gazette online); Public Record Office Victoria; digitised newspapers; LANDATA (historical aerial photographs); and historical photographs from publicly accessible online collections.
- 42 The contextual history drew from the 'Thematic History: A history of the City of Melbourne's urban environment' by Context Pty Ltd (2010), and historical information in the East Melbourne & Jolimont Precinct statement of significance (Melbourne Planning Scheme Incorporated Document: Heritage Precincts Statements of Significance, February 2020). The contextual history includes two new historical themes of particular relevance to the study area, but which were not sufficiently addressed in the existing thematic history — Australian Rules football, and Grandstands and pavilions.
- 43 The place history is broadly chronological. It includes a history of the use and development of Punt Road Oval and of the place components. The contextual and place histories informed the assessment of historical, representative, social and associative significance.

3.3 Site inspection

- 44 The site inspections were aimed at identifying and photographing key site features that appeared to be early or directly associated with the historic layout and use of the place, and changes over time. The site inspection also considered the visibility and prominence of the place from its broader setting, in order to understand streetscape presence and contribution.
- 45 The site visits were supplemented by current aerial imagery (from Nearmap).
- 46 The site visits provided the relevant information for the place description and integrity statement, supported by the place history and analysis of archival sources (mainly plans held at PROV), historic images and historic aerial photographs.

3.4 Description

- 47 A description was prepared of the place as a whole, its setting, and its component parts. Build dates and sequences of development and change were supported by the place history.

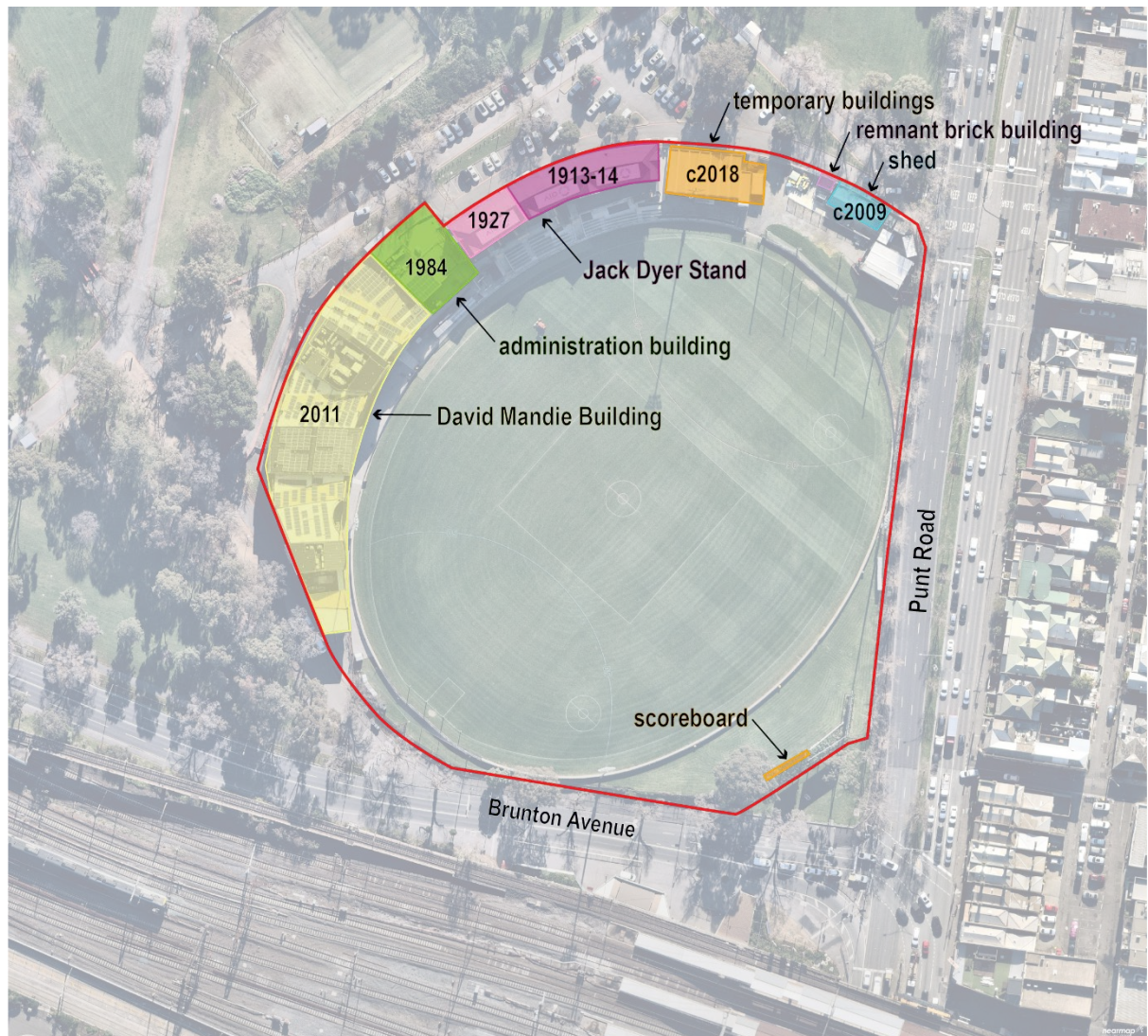


Figure 1. Punt Road Oval (Richmond Cricket Ground) with buildings and other features indicated. (Source: Nearmap with GML overlay)

- 48 The major elements of the site are the oval, the Jack Dyer Stand (1913-14, 1927), the David Mandie Building (2011). Also at the site are other buildings and structures, fencing, entries, seating and landscape elements.



Figure 2. Punt Road Oval and the 1913–14 Edwardian grandstand with 1927 extension (western end), viewed from the southeast, named the Jack Dyer Stand in 1998. (Source: Context 2021)



Figure 3. East and the curved north elevation of the Jack Dyer Stand. (Source: Context 2021)



Figure 4. East elevation of the Jack Dyer Stand, and decorative detailing to east and south elevations. (Source: Context 2021)



Figure 5. 2011 David Mandie Building (south elevation) facing the ground. (Source: Context 2021)



Figure 6. Entrance to the Tigers Roar Store and southeastern corner of the building. (Source: Context 2021)



Figure 7. Northern end of the David Mandie Building, with Jack Dyer Foundation Walkway of Honour. (Source: Context 2021)



Figure 8. Ramp entry to the administration building. (Source: Context 2021)



Figure 9. Remnant red brick building, north end of the ground. (Source: Context 2021)



Figure 10. Administration building, with JD Langdon Boardroom. (Source: Context 2021)



Figure 11. View to the rear of the Jack Dyer Stand approaching from Yarra Park (northeast). (Source: Context 2021)



Figure 12. View towards Punt Road Oval from Richmond Railway Station. (Source: Context 2021)



Figure 13. Cyclone fencing, mounding along the Brunton Avenue boundary. (Source: Context 2021)



Figure 14. View of the oval, scoreboard, billboard and Spotted Gum (left) at the south east corner of the oval, from the Brunton Avenue corner with Punt Road. (Source: Context 2021)

3.5 Integrity

- 49 An integrity statement about the changes and relative intactness of the place as a whole and of the Jack Dyer Stand was prepared. It includes a statement of the extent to which the place and the Jack Dyer Stand retain the ability for their heritage values to be appreciated and understood.

- 50 It was concluded that the Punt Road Oval has relatively high integrity. Like other football grounds in Melbourne associated with the early VFL and AFL clubs, the ground has undergone change in response to changing demand and to meet changing standards and requirements associated with Australian Rules football.
- 51 The ground remains in its original location, but the overall size and shape of the oval has changed over time. Entrances and access points have changed (although entrances at the northern and southern ends of the oval are longstanding features), and pavilions, stands, and turnstiles have been built and moved or replaced over time.
- 52 In spite of changes, key attributes of the place remain, including the oval, the Edwardian grandstand (the Jack Dyer Stand), grassed embankments and the location of a scoreboard on the southeast corner embankment.
- 53 Built form has consistently been limited to the north and west sides, meaning the visibility of the ground from the surrounding public domain, including from Yarra Park, Punt Road, Brunton Avenue, the multiple-track railway line and Richmond Railway Station, contribute to its presence and landmark qualities.
- 54 Other longstanding attributes include the use of the place by the Richmond Football Club.
- 55 The Jack Dyer Stand is the earliest building surviving at the site (opened 1914). In spite of an addition at the west end in 1927 (which is in keeping with the original), replacement of the original stairs and alterations to some fenestration and the podium, it remains strongly legible as an Edwardian-era grandstand.

3.6 Comparative analysis

- 56 Comparative analysis is a critical step in determining whether a place meets the local (or State) threshold for heritage significance. The PPN01 advises that:
- ... some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those that have previously been included in a heritage register or overlay.*
- 57 Comparative analysis was undertaken to substantiate significance of the place. The comparative analysis drew on other similar places within the City of Melbourne in the Heritage Overlay and on the Victorian Heritage Register. Where directed by the contextual history of the place, the comparative analysis was expanded to include examples in other municipalities and examples on the Victorian Heritage Register, where these places had a similar history or represented comparable historical themes.

- 58 Key references for comparative analysis were the Hermes and Victorian Heritage databases, *Football Grounds of Melbourne* (Caruso 2002), and the 'Victoria Park Abbotsford Conservation Management Plan' (Allom Lovell & Associates 2003).
- 59 Comparative analysis of the place as a whole and of the Jack Dyer Stand was prepared against key themes identified through the historical research and field survey:
- Early reservation of land for public recreation
 - Early grounds used in association with VFA and VFL
 - Early grandstands at Melbourne sports grounds
 - Other grandstands designed by architect Thomas Watts
- 60 From the comparative analysis we determined that Punt Road Oval is one of a number of sporting grounds and playing fields within larger areas of land in and surrounding Melbourne which were set aside for public purposes in the mid-nineteenth century, and were reserved as public parks and gardens.
- 61 There were inner ring parks which were generally carefully designed and curated gardens intended for passive recreation, and outer ring parks which generally exhibited less refined design attempts and were used for both active and passive recreation as well as for a range of non-recreational public purposes. Punt Road Oval is located within one of the outer ring parks, Yarra Park.
- 62 In the context of early sporting grounds used for Australian Rules football by the early VFA and professional VFL clubs, Punt Road Oval is comparable to Princes Park (the home of Carlton Football Club, established 1864), Melbourne Cricket Ground (also within Yarra Park), and South Melbourne Cricket Ground (within Albert Park Lake reserve).
- 63 Melbourne Cricket Ground (1853, also within Yarra Park), and South Melbourne Cricket Ground (1862, within Albert Park Lake reserve) were both initially formally established as cricket grounds, like at Punt Road Oval (Richmond Cricket Ground, 1853, in Yarra Park).
- 64 Punt Road Oval is one of a small number of the early football grounds in Melbourne to retain an early grandstand. It is not the earliest. One of the earliest surviving grandstands is the Brunswick Street Oval Grandstand, built in 1888 to a design by architect Nathaniel Billing (VHR H0751).
- 65 The Jack Dyer Stand is not the earliest known grandstand to have been built to a design by architect Thomas Watts. Other early stands known to have been designed by Thomas Watts were built at Prince's Park, Maryborough (1895, VHR H1880) and Victoria Park, Abbotsford (1909, demolished 1966).
- 66 The 1913–14 Jack Dyer Stand at Punt Road Oval is distinguished by its curved form that follows the arc of the oval. The curved form for a grandstand was not

unprecedented; being used earlier by architect Frank Stapley (who also designed the 1927 wing of the Jack Dyer Stand at Punt Road Oval) in the 1909 design for the Ald Gardiner Stand at the Carlton Football Club's ground in Princes Park, North Carlton.



Figure 15. Grandstand at Prince's Park, Maryborough, built in 1895 to a design by Thomas Watts. (Source: VHD report for Prince's Park, Maryborough, VHR H1880)



Figure 16. Members Stand at Victoria Park, built to a design by architect Thomas Watts in 1909 (demolished). (Source: McFarlane and Roberts 1999, in Allom Lovell & Associates 2003: 24)



Figure 17. Early image of the grandstand (Jack Dyer Stand) at Punt Road Oval, built 1913–14 to a design by Thomas Watts & Son (shown here before the 1927 extension to the west). (Source: Hansen 1989: 34)



Figure 18. The 1909 Ald Gardiner Stand at Princes Park, Carlton North, can be seen in the background, with Carlton player, c1920–50. Photographer: Charles Edward Boyles. (Source: State Library Victoria, Accession No. H2008.122/161)



Figure 19. The 1888 Brunswick Street Oval Grandstand, Edinburgh Gardens (HO215, City of Yarra and VHR H0751). (Source: VHD)



Figure 20. St Kilda Cricket Ground, Queens Road and Fitzroy Street, St Kilda, with the 1925–26 Murray Stand (left) and 1933–34 Blackie Ironmonger Stand (right) (HO463 City of Port Phillip and VHR H2234). (Source: VHD)



Figure 21. South Melbourne Cricket and Football Club Grandstand, Lakeside Oval, South Melbourne, constructed in 1926 to replace an earlier stand destroyed by fire (National Trust Property No. B6652). (Source: VHD)

3.7 Assessment against criteria

- 67 Consistent with PPN01, the assessment of the heritage value of the Punt Road Oval (Richmond Cricket Ground) used the recognised heritage criteria:
- *Criterion A: Importance to the course or pattern of our cultural or natural history (historical significance).*
 - *Criterion B: Possession of uncommon, rare or endangered aspects of our cultural or natural history (rarity).*
 - *Criterion C: Potential to yield information that will contribute to understanding our cultural or natural history (research potential).*

- *Criterion D: Importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness).*
- *Criterion E: Importance in exhibiting particular aesthetic characteristics (aesthetic significance).*
- *Criterion F: Importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance).*
- *Criterion G: Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance).*
- *Criterion H: Special association with the life or works of a person, or group of persons, of importance in our history (associative significance).*

68 The review determined that Punt Road Oval (Richmond Cricket Ground) met the threshold for local heritage significance under Criterion A, Criterion D, Criterion E, Criterion G and Criterion H.

69 The assessment against Criterion G considered the Heritage Council of Victoria's *Guidance on Identifying Places and Objects of State-Level Social Value in Victoria* (2019). Although prepared for the assessment of places at the State level, in the Victorian context there is no companion set of guidelines for assessing social significance at the local level.

3.8 Statement of significance

70 As the Punt Road Oval was found to meet the threshold of local significance against at least one criterion, a Statement of Significance was prepared.

71 The Statement of Significance is in accordance with the Burra Charter principles and the PPN01 guidelines. The statement of significance responds to and is structured in the format recommended by PPN01, as follows:

What is significant? – This section should be brief, usually no more than one paragraph or a series of dot points. There should be no doubt about the elements of the place that are under discussion. The paragraph should identify features or elements that are significant about the place, for example, house, outbuildings, garden, plantings, ruins, archaeological sites, interiors as a guide to future decision makers. Clarification could also be made of elements that are not significant. This may guide or provide the basis for an incorporated plan which identifies works that many be exempt from the need for a planning permit.

How is it significant? – Using the heritage criteria above, a sentence should be included to the effect that the place is important. This could be because of its historical significance, its rarity, its research potential, its representativeness, its aesthetic significance, its technical significance

and/or its associative significance. The sentence should indicate the threshold for which the place is considered important.

Why is it significant? – The importance of the place needs to be justified against the heritage criteria listed above. A separate point or paragraph should be used for each criterion satisfied. The relevant criterion should be inserted in brackets after each point or paragraph. Each point or paragraph, for example “(Criterion G)”.

- 72 The statement of significance prepared for Punt Road Oval clearly lists all elements that contribute to significance under the ‘What is significant?’ heading.

3.9 Mapping and curtilages

- 73 PPN01 provides guidance on defining curtilages and Heritage Overlay polygons for heritage places and associated land. It states the following in regard to the mapping of heritage places:

The Heritage Overlay applies to both the listed heritage item and its associated land. It is usually important to include land surrounding a building, structure, tree or feature of importance to ensure that any development, including subdivision, does not adversely affect the setting, context or significance of the heritage item. The land surrounding the heritage item is known as a ‘curtilage’ and will be shown as a polygon on the Heritage Overlay map. In many cases, particularly in urban areas and townships, the extent of the curtilage will be the whole of the property (for example, a suburban dwelling and its allotment).

- 74 A curtilage was defined for Punt Road Oval that included the whole of the property plus an area of land in the southeast corner of the site that is important to the setting and significance of the place.
- 75 I note that the area abuts the boundary of HO194 for Yarra Park. Yarra Park is also registered on the Victorian Heritage Register (H2251) and is therefore subject to the provisions of the *Heritage Act 2017*. For this reason the curtilage did not extend into the adjoining land in Yarra Park.

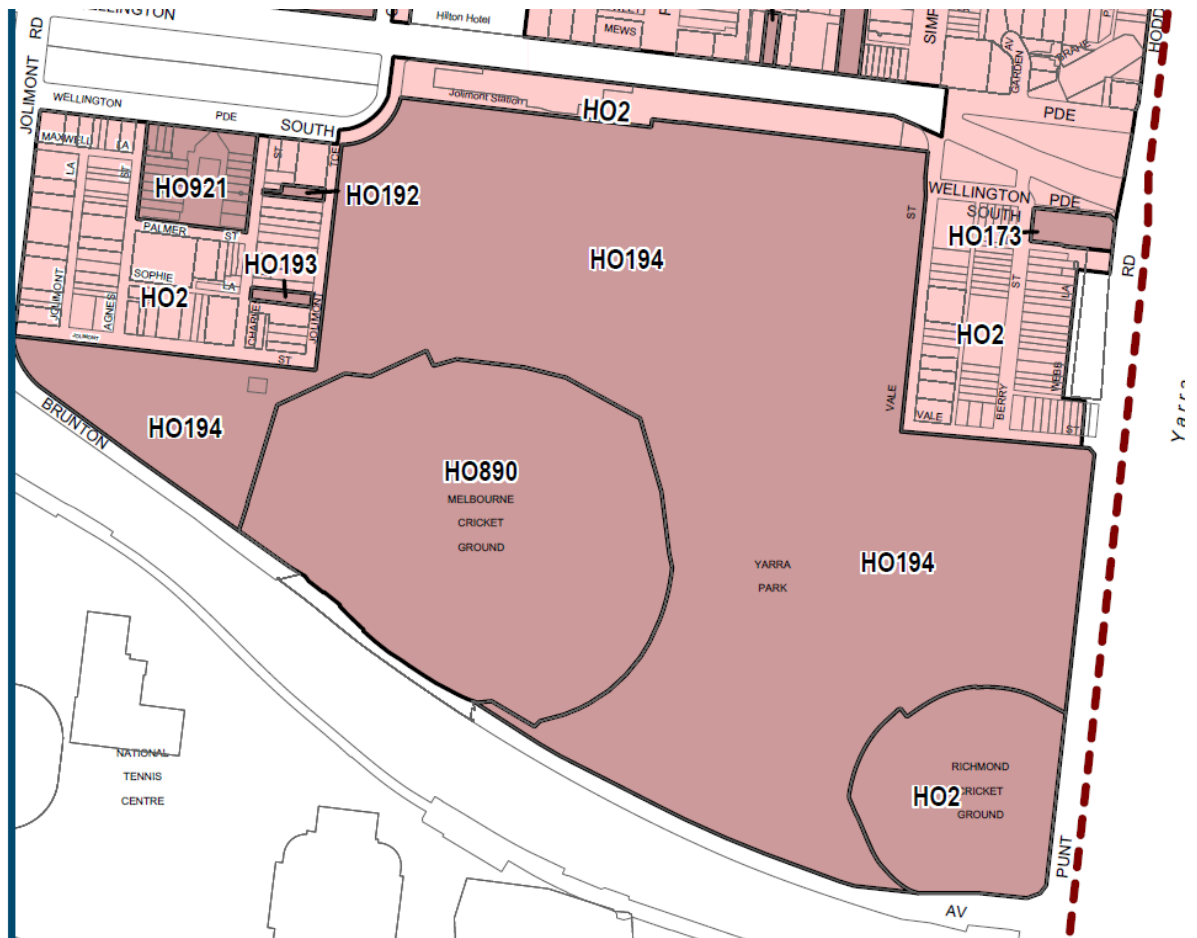


Figure 22. The existing map in the Melbourne Planning Scheme for Map No. 09ho, showing the Richmond Cricket Ground as part of HO2.

4 Findings and Recommendations

4.1 HO2 East Melbourne & Jolimont Precinct

- 76 The Review determined that Punt Road Oval was appropriately included in the Statement of Significance for HO2 because of the historical connections of this area of land within Yarra Park (I note that Yarra Park is not in HO2 but is referred to within the statement for HO2). The Review also determined that Punt Road Oval (Richmond Cricket Ground) met the threshold for a 'significant heritage place' within HO2 in accordance with the category definitions in Local Planning Policy Clause 22.05 of the Melbourne Planning Scheme for heritage places outside the Capital City Zone. Because Punt Road Oval is not part of a collection or group of buildings or places, and in accordance with the definition for significant streetscapes, the Review determined that Punt Road Oval was not located within a Significant streetscape.
- 77 In October 2021, DELWP advised the City of Melbourne that it would be unlikely to support a separate statement of significance for Punt Road Oval being included in the entry for HO2 in the Schedule to Clause 43.01 (Heritage Overlay), because this would not be consistent with the situation for other significant places within HO2.
- 78 Pursuant to the advice from DELWP to the City of Melbourne in October 2021, to ensure the statement of significance can be listed in the Schedule to Clause 43.01 (Heritage Overlay) entry for Punt Road Oval and be an incorporated document to the Melbourne Planning Scheme, the Review recommended that Punt Road Oval be removed from HO2 and be made a new individual Heritage Overlay (HO1400).

4.2 Punt Road Oval (Richmond Cricket Ground)

- 79 As noted above, Punt Road Oval (Richmond Cricket Ground), Punt Road, East Melbourne, was assessed as being of local significance as an individual place.
- 80 The Review found Punt Road Oval (Richmond Cricket Ground), Punt Road, East Melbourne, to be of local historical, representative, aesthetic, social, and associative significance to the City of Melbourne. A full citation, including a Statement of Significance, was therefore prepared for the place.

4.2.1 Statement of Significance

- 81 The Statement of Significance for Punt Road Oval (Richmond Cricket Ground), Punt Road, East Melbourne prepared in October 2021 and included in the *Punt Road Oval Heritage Review, October 2021*, reads as follows:

What is significant?

The Punt Road Oval (Richmond Cricket Ground) at Punt Road, East Melbourne, which was cleared, levelled and fenced in 1856 and used for the first time as a cricket ground in November 1856, is significant.

Elements that contribute to the significance of the place include (but are not limited to):

- the oval
- grassed embankments on the south and east sides and at the southeast corner of the ground
- the restriction of built form to the west and north boundaries of the ground
- open sides to the ground and transparent perimeter fencing on the east (Punt Road) and south (Brunton Avenue and railway line) boundaries
- the landmark qualities of Punt Road Oval
- the Jack Dyer Stand (1913–14) and 1927 west wing addition.

Elements that contribute to the significance of the Jack Dyer Stand include (but are not limited to):

- the building's original curved plan form, materials and detailing, built to the design of architects Thomas Watts & Son
- the 1927 west wing addition built to the design of architect Frank Stapley
- the building's relatively high integrity to its early design to all elevations
- the hip and gabled roof form
- the pattern and size of original fenestration
- slender cast iron and timber columns, decorative timber brackets and timber fretwork frieze; and
- other decorative details.

More recent buildings, including the administration building, the David Mandie Building, and the remnant red brick building, are not significant. The fabric of recent landscaping such as the cyclone wire fencing and gates around the perimeter of the ground, the pipe rail fencing around the oval, and the northeast corner wall and the Spotted Gum in the southeast corner of the ground are not significant.

More recent alterations and additions to the Jack Dyer Stand, including changes at podium level, modern external stairs, new openings in the curved north elevation, and commentary box within the stadium seating area are not significant.

How is it significant?

Punt Road Oval (Richmond Cricket Ground) at Punt Road, East Melbourne, is of local historical, representative, aesthetic, social, and associative significance to the City of Melbourne.

Why is it significant?

The Punt Road Oval, occupying the Traditional Country of the Wurundjeri Woiwurrung people of the East Kulin Nation, is of historical significance as part of the former Richmond Paddock (Yarra Park), which was used as an East Kulin living area, ngarrga and ceremonial ground, both prior to the British colonisation of Port Phillip and during the early settlement period in the 1830s and 1840s. It was used as a ngarrga and ceremonial ground in the 1840s. (Criterion A)

The Punt Road Oval, as part of the former Richmond Paddock (Yarra Park) that was set aside in 1837, is of historical significance for its use for the policing and administrative purposes of the colonial government of the Port Phillip District. From 1837, the wider area was used by Police Magistrate William Lonsdale, by the Mounted Police and the Native Police, and by officers of the Port Phillip Aboriginal Protectorate. (Criterion A)

The Punt Road Oval is of historical significance as an early cricket ground in Melbourne that was established in 1853 and used by the Richmond Cricket Club from 1856. It was used as a cricket ground for over 150 years and was the venue for significant events including interstate matches and as a training ground for the Aboriginal Cricket Team in 1867–68. (Criterion A)

The Punt Road Oval, established as the Richmond Cricket Ground in 1853, is of historical significance for its use as an early football ground from 1860 and its association with the early Richmond football team from that time, and for its earlier role in the development of the code of Australian Rules football in 1858; as the home ground for the present Richmond Football Club from 1885 to 1964 and for its use (up until the present time) as the club's training ground and administrative centre. The development of the ground from 1907 when the club was accepted into the Victorian Football League, and through the early and mid-twentieth century, reflects the significant growth in membership of the Richmond Football Club over this time and the growing spectator base for Richmond home games. This period saw the construction of a large Edwardian grandstand in 1913–14 (named the Jack Dyer Stand in 1998), built to a design by architects Thomas Watts & Son and extended in 1927 to a design by architect Frank Stapley; a second grandstand, the Members Stand (later named the EM King Stand), erected in 1937–38 and since demolished; and other changes to the ground over time. (Criterion A)

The brick Edwardian-era Jack Dyer Stand is of representative significance as an example of the larger and more elaborate football stands that emerged in the late nineteenth century and early twentieth century. It retains key distinguishing features of its original 1913 design by Thomas Watts & Son and the matching 1927 extension designed by architect Frank Stapley. The stand is distinguished from the earliest known grandstand designed by Thomas Watts which is at Maryborough (1895) by its curved plan. The curved plan form is not typical for grandstands of this era. An earlier example is the 1909 Ald Gardiner Stand, Princes Park. (Criterion D)

The Punt Road Oval, as part of the former Richmond Paddock (Yarra Park) set aside in 1837, is of social significance for its important associations with the Aboriginal history of Melbourne; this includes being part of the wider Richmond Paddock that was a traditional East Kulin living area, and ngarrga and ceremonial ground that continued to be used as such into the 1840s, and being occupied by the Native Police Corps as a site for police training and police barracks. The Punt Road Oval, formerly the Richmond Cricket Ground, is also significant for its use as a training venue in 1867–68 for the Aboriginal Cricket Team made up of men from different parts of Victoria, and its current use as a training centre for Indigenous youth. (Criterion G)

The Punt Road Oval is of social significance for its long association with the Richmond Football Club, which used the oval as its home ground from 1884 until 1965; for its use by Richmond Football Club as a training ground and administrative centre from 1965 until the present day; and for its association with earlier Richmond football teams that also used the ground from 1860. The community for whom the place is significant includes members and supporters of the Richmond Football Club; past and present players, coaches and staff of the Richmond Football Club; residents of Richmond; and Melburnians more broadly. This community has had a strong attachment to the place for over 130 years. This attachment is strengthened by the strong and distinctive community identity of Richmond though much of the twentieth century. This was heavily anchored in local working-class politics that promoted fierce loyalty and physical toughness, which translated easily to football—for many Richmond supporters, 'Tigerland' is another name for Richmond. The social significance of the place as the former home ground of the Richmond Football Club resonates in the continued use of the ground for training; as the site of post-grand final premiership celebrations; and its powerful symbolic meaning to Richmond residents and followers of the Richmond football team who regard the ground as the spiritual home of the club. Its resonance is strengthened by the ground's presence and visibility from major transport corridors (Punt Road, Brunton Avenue, the multi-track railway line and Richmond Railway Station) and within Yarra Park, making it a prominent landmark in the local area. The Richmond Cricket Ground is also of potential social significance to players, coaches and other staff, members and supporters of the Richmond Cricket Club, which was based at the ground for over 150 years—from 1854 until relocating to Waverley Park in 2011. (Criteria E and G)

The Punt Road Oval is of significance for its association with champion Richmond footballer John ('Jack') Raymond Dyer (1913–2003). Nicknamed Captain Blood, Dyer was captain-coach of Richmond in the 1930s and 1940s and one of the greats of the game, recognised for his strategic play, fine marking and straight kicking. He was selected numerous times for the Victorian team and was inducted into the Australian Football Hall of Fame. A bronze statue of Dyer was erected outside the ground in 2003 and the 1913–14 grandstand was named in his honour in 1998. (Criterion H)

The Punt Road Oval is of significance for its association with Thomas Wentworth Wills (1835–1880), first-class cricketer and co-founder of Australian Rules football. Wills was a member of the Richmond Cricket Club and one of its leading players in the 1850s and 1860s; he was also selected for intercolonial matches. In 1858–59 he was a co-founder of a new code of football suitable for conditions in the Colony of Victoria. Initially known as Melbourne rules football and later as 'Australian rules', this was the first game of football in the world to be formally codified. (Criterion H)

4.2.2 Recommendations

- 82 On the basis of Punt Road Oval being assessed as a locally significant individual place, it was recommended that:
- Punt Road Oval (Richmond Cricket Ground) be removed from HO2 (Map No. 09ho).
 - Punt Road Oval (Richmond Cricket Ground) be made an individual Heritage Overlay in the Schedule to Clause 43.01 (Heritage Overlay).
 - The statement of significance for Punt Road Oval (Richmond Cricket Ground) be listed in the entry for Punt Road Oval in the Schedule to Clause 43.01 (Heritage Overlay)
 - The statement of significance for Punt Road Oval (Richmond Cricket Ground) be included as an incorporated document to the Melbourne Planning Scheme.

Mapping and curtilage

- 83 It was recommended the Heritage Overlay polygon for Punt Road Oval (Richmond Cricket Ground) extend to the Punt Road Oval property boundary including the small areas of land within the Punt Road Oval property boundary not currently included in the HO2 boundary, and extend to include the small section of parkland in the southeast corner removed from HO2 (see Figures 4 and 5).
- 84 Applying the Heritage Overlay polygon to the Punt Road Oval property boundary is consistent with the general direction in PPN01 for curtilages and Heritage Overlay polygons. Extending the curtilage to include the additional area of

parkland in the south east corner is important for ensuring an appropriate setting for the Oval is retained and for ensuring the significant landmark qualities of the Punt Road Oval are retained and protected.

- 85 To this end, the Review recommends that the new Heritage Overlay be applied to the extent of Punt Road Oval (Richmond Cricket Ground) and the small section of parkland to the southeast removed from HO2 and include the small areas of land adjacent to the Punt Road Oval property boundary (south and east) that were not previously included in HO2.
- 86 I note that two additional areas of land in the southeast corner of the site have had their land status clarified by Department of Transport in their submission to C405 (Submission 9, see Section 5.4 below).



Figure 23. Recommended curtilage for Punt Road Oval (Richmond Cricket Ground).

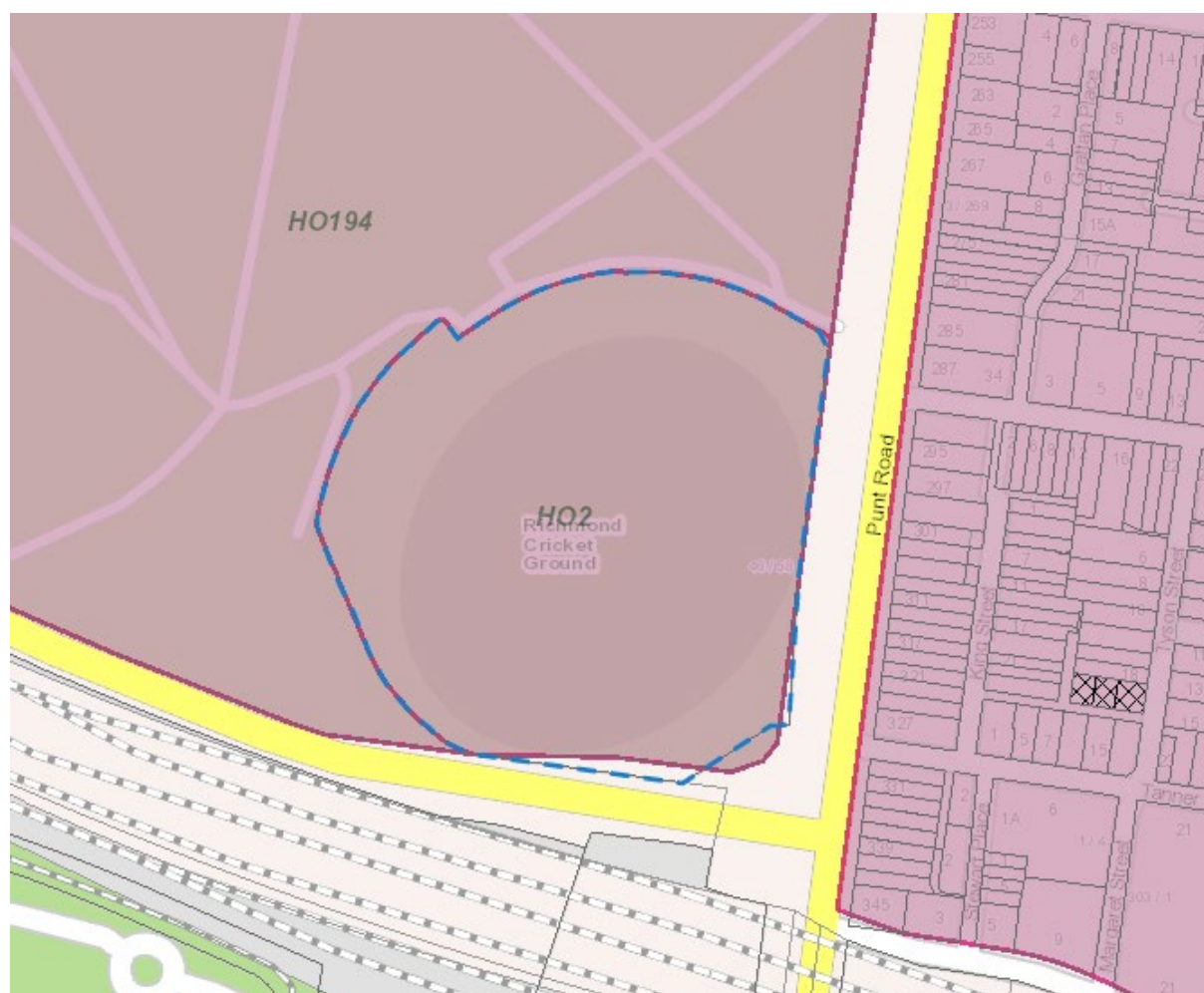


Figure 24. Detail of VicPlan map with the Heritage Overlay layer visible. The dashed blue outline denotes the Punt Road Oval property boundary as shown on VicPlan, which aligns with the property boundary in the City of Melbourne's mapping system. Note the small 'lip' of land in the south east corner in the existing HO2 boundary. This area of parkland and all land within the Punt Road Oval property boundary are recommended for inclusion in the new Heritage Overlay for Punt Road Oval. (Source: VicPlan, <https://mapshare.vic.gov.au/vicplan/>)

Schedule to Clause 43.01 (Heritage Overlay)

- 87 The Review recommended that Punt Road Oval (Richmond Cricket Ground) be made an individual Heritage Overlay with the statement of significance included in the Schedule to Clause 43.01 (Heritage Overlay) as an incorporated document to the Melbourne Planning Scheme.
- 88 The Review also recommended that recognition of the Aboriginal history and significance of the Punt Road Oval (Richmond Cricket Ground) be reflected in the Schedule to Clause 43.01 (Heritage Overlay) of the Melbourne Planning Scheme

by adding a 'Yes' in the ninth column 'Aboriginal heritage place?' External paint controls were applied for the Jack Dyer Stand.

Table 1 Schedule to Clause 43.01 (Heritage Overlay)

PS map ref	Heritage place	External paint controls apply?	Internal alteration controls apply?	Tree controls apply?	Outbuildings or fences not exempt under Clause 43.01-4	Included on the Victorian Heritage Register under the Heritage Act 2017	Prohibited uses permitted?	Aboriginal heritage place?
HO tbc	Punt Road Oval (Richmond Cricket Ground), Punt Road, East Melbourne Statement of Significance: Punt Road Oval (Richmond Cricket Ground) October 2021	Yes	No	No	No	No	No	Yes

5 Response to submissions

5.1 Introduction

- 89 This section of the evidence responds to formal submissions received following public exhibition. Three of the submissions received were relevant to the Punt Road Oval:
- Submission 5, prepared by Richmond Football Club
 - Submission 7, prepared by the National Trust of Australia (Victoria)
 - Submission 9, prepared by Department of Transport.
- 90 I have reviewed the three submissions. The heritage-related matters in the submissions are summarised, with my responses following.
- 91 I respond only to issues related to the heritage significance of the place, and the assessment of heritage significance. I have not responded to issues that are associated with management of the identified heritage values. Such matters (including property value, maintenance costs, and future development plans) either do not form part of the heritage assessment process or would ordinarily be assessed as part of a planning permit application should the place be added to the Heritage Overlay.

5.2 Submission 5—Richmond Football Club

- 92 In summary, in Submission 5, the RFC agrees it is appropriate that Punt Road Oval continues to be recognised as a location of local heritage significance. The submission raised issues about how significance was attributed.
- As was clear in the materials lodged in support of C421, we agree that the Punt Road Oval is of local heritage significance. However, there are a number of aspects of the statement of significance that are questioned. (Submission 5)*
- 93 I prepared a response to the matters raised in Submission 5 as a memorandum dated 18 July 2022. I conferred on matters relevant to historical and associative significance and social value with Dr Helen Doyle. The substantive content in my response to specific issues is set out below.

5.2.1 General heritage matters

- 94 The heritage matters raised in the submission and my responses are set out below. (The text quoted from the RFC submission is in italics.)
- 95 *We note that the proposed application of land outside the existing HO2 includes land that is Department of Transport land along both Brunton Avenue and at the corner of Brunton Avenue and Punt Road. Whilst this is land that was historically part of Punt Road Oval, there are clearly some anomalies in this location. It may have been appropriate for Council to also use this opportunity to clean up the zonings in this location (i.e. application of the TRZ to the Department of Transport land).*
- 96 Response: A curtilage for a site-specific HO for Punt Road Oval was defined with reference to Planning Practice Note 1: Applying the Heritage Overlay. The curtilage is appropriate on the basis that it includes the heritage item and its associated land plus some surrounding land 'to ensure that any development, including subdivision, does not adversely affect the setting, context or significance of the heritage item' (PPN01).
- 97 *We note the appendix to the report continues to recommend retention within HO2.*
- 98 Response: The recommendation in the report's appendix which states 'Recommended as Significant within HO2 (East Melbourne & Jolimont Precinct)' has been retained in error.
- 99 *Whilst this location is the original home of the Richmond Cricket Club, they now play in Glen Waverley. Whether the citation should include Richmond Cricket Ground is questioned. At the least the background document by Context should appropriately discuss the historical relationship of cricket in this location but confirming that cricket is not a contemporary use of the land.*
- 100 Response: The area of ground now known as Punt Road Oval was requested for use by the Richmond Cricket Club in the 1850s. The early placename, Richmond Cricket Ground, recognises this early use. It is appropriate to include an original and long historical use of a place in the citation. Richmond Cricket Ground is the place name recorded in related historical records including the Public Building file (held at Public Records Office Victoria). It is common practice to acknowledge an original historical place name in the naming of an individually significant place. We note that the name Richmond Cricket Ground is included in parentheses, after the current place name. The citation does not currently state that cricket is not a current use of the land. Detail as to when cricket stopped being played at the ground, in 2011, should be added to the history and to the statement of

significance. The sentence in the 'What is significant?' section should be updated to '...used for the first time as a ~~cricket~~ sporting ground in November 1856...'

101 *As was clear in the materials lodged in support of C421, we agree that the Punt Road Oval is of local heritage significance. However, there are a number of aspects of the statement of significance that are questioned.*

102 *Under the heading 'What is significant?', there are elements that are said to contribute to the significance of the place and others are also listed and are said not to be significant. In commenting on these, we suggest that just because a current element or a characteristic of the place may be of relatively long standing, that does not make it significant.*

103 Response: It is agreed that being an element of long-standing does not necessarily make an element or characteristic significant. Our approach to determining significance is in accordance with the Burra Charter, whereby

...cultural significance of a place is assessed by analysis of evidence gathered through the physical investigation of the place, research and consultation. (Burra Charter Practice Note, Assessing cultural significance, 2013)

104 The statement of significance does not include all elements of long standing, but those elements which, following analysis and assessment, were determined to be important for understanding the significance of the place. They were determined to be elements that contribute to significance because of their ability to demonstrate the history of the place, the historic and long-standing activities associated with the place, or for their particular aesthetic qualities.

5.2.2 Matters raised relating to 'What is significant?'

105 *The oval—It should be made clear that the fabric and specific configuration of the oval is not of significance. The oval configuration has varied over time, particularly as a response to changes to the road network with changes at Brunton Avenue and Punt Road both resulting in substantial changes to the oval configuration.*

106 Response: The statement of significance should be amended to make it clear that the fabric and the specific configuration of the oval are not of significance.

107 *Grassed embankments: We don't believe the Context report provides sufficient detail as to the significance of these elements.*

108 Response: The grassed embankments continue the spatial containment of the oval established by the built form to the north and west. The oval is spatially and visually open to Punt Road. This openness allows for people to watch training from the Punt Road footpath and to see and engage with the ground and its activities from the public domain.

- 109 *The restriction of built form to the west and north boundaries of the ground: We don't believe the Context report provides sufficient detail as to the significance of this aspect of the place, which is not an element or physical feature but a comment on the way the site has evolved.*
- 110 Response: PPN01 states that 'A Heritage Overlay is usually applied when there is "something" to manage. This "something" is usually tangible, but it may, for example, be an absence of built form or the presence of some other special characteristics.' (PPN01) The absence of built form, particularly to the Punt Road (east) side of the oval, contributes to the landmark quality of the place as it is experienced from the public domain. This justification should be added to the citation.
- 111 Our response in relation to this point was subsequently revisited – see paragraphs 129 to 132 below.
- 112 *Open sides to the ground and transparent perimeter fencing on the east (Punt Road) and south (Brunton Avenue and railway line) boundaries—There is lack of clarity around what is meant by this comment and we do not believe the significance of this characteristic of the place is confirmed. The cyclone wire fencing is elsewhere identified as not significant*
- 113 Response: The absence of built form, in particular on the Punt Road (east) side of the oval, contributes to the landmark quality of the place as it is experienced from the public domain. See also the response below in relation to landmark qualities at paragraph 115.
- 114 *The landmark qualities of Punt Road Oval: Again, there is a lack of clarity around what this means and the implications of this 'landmark' descriptor are unclear.*
- 115 Response: 'Landmark' generally refers to a conspicuous object or feature that has become an orientational reference point within a district or landscape (Oxford English Dictionary). At Punt Road Oval, the relationship of the place to its setting is important; the oval is a large visual reference point along Punt Road and adjacent to the railway. It is also a social and cultural reference point. This justification should be added to the citation.
- 116 *The Jack Dyer Stand (1913– 14) and 1927 west wing addition: We agree there is local heritage significance to the stand. Perhaps 'other decorative details' could be detailed?*
- 117 Response: The comparative analysis supports the local heritage significance of the Stand. The last two dot points under 'What is significant?' should be combined and the final dot point deleted. The combined dot point should be:
- slender cast iron and timber columns, decorative timber brackets and timber fretwork frieze, gable end details, and vents.

5.2.3 Other matters raised in relation to the statement of significance

118 *Social significance: Without questioning the place is of social significance, the claim for this is extremely broad. Punt Road Oval is said to be as related to a defined community comprising supporters and others associated with the Richmond Football Club and Richmond residents, as well as 'Melburnians more broadly'. It is said this 'community' has had a strong attachment to the place for over 130 years. This claim appears too strong and we consider this overstatement could be removed from the statement.*

119 Response: The claim should be expressed with a more focused attribution of values to different communities. The value to residents of Richmond, and Melburnians more generally, would be appropriately associated with the landmark quality of the place. Parts of paragraph 7 in the 'Why is it significant?' section of the Statement should be edited to this end:

Sentence 2:

The community for whom the place is significant includes members and supporters of the Richmond Football Club; past and present players, coaches and staff of the Richmond Football Club; residents of Richmond; and Melburnians more broadly. This community has had a strong attachment to the place for over 130 years.

Sentence 7:

Its resonance is strengthened by the ground's presence and visibility in the urban landscape, visually prominent in views from major transport corridors (Punt Road, Brunton Avenue, the elevated railway line and Richmond Railway Station) and within Yarra Park, making it a prominent landmark in the local area for residents of Richmond and Melburnians more generally.

120 *Social significance/aesthetic significance: A further comment is made in the discussion of social significance to the effect that the 'resonance' [of the place] is strengthened by 'the ground's presence and visibility from major transport corridors (Punt Road, Brunton Avenue, the multi-track railway line and Richmond Railway Station) and within Yarra Park, making it a prominent landmark in the local area'. In this regard, Criterion E (Importance in exhibiting particular aesthetic characteristics) is referenced along with Criterion G at the end of this discussion.*

121 *Aesthetic significance is also claimed under How is it significant?' however no explanation is given as to what aspect of the place makes it of aesthetic significance and how it is significant. It is commented while a place may be visible from a range of locations or be a familiar element in an urban environment, that does not necessarily equate with landmark status, nor with aesthetic or other heritage significance.*

- 122 Response: For understanding and assessing aesthetic value, the Burra Charter provides a series of questions, including:
- Is the place distinctive within the setting or a prominent visual landmark?*
- 123 The assessment identified the landmark quality of the Punt Road Oval, for its visual prominence in the local area. Presence of landmark quality is an indicator of aesthetic significance. Importance to the community as a landmark, marker or signature is an indicator of social significance. In the statement of significance for Punt Road Oval, the combination of social and aesthetic significance (Criteria E and G) recognises the landmark quality of the place and the communities for whom the place has landmark value.
- 124 *Associational significance: Jack Dyer was a champion of the club and his status in the history of the Richmond Football Club and VFL/AFL football is unquestioned (and clearly is recognised at the place). It is not clear, however that the ground should be considered to be of heritage significance against this criterion for its association with an individual player.*
- 125 Response: Criterion H recognises the 'special association with the life or works of a person, or group of persons, of importance in our history (associative significance)'. (PPN01) The association of the place with Jack Dyer was direct and enduring, and it remains evident in the physical fabric of the place (in the name of the stand renamed in Dyer's honour in 1998, the 2003 statue and the Jack Dyer Foundation wall). As noted in the history, and acknowledged in the submission, Dyer was an important figure in the history of the Richmond Football Club and in the VFL/AFL. For these reasons, recognition of the historical association of Dyer with the place under Criterion H is appropriate.
- 126 *Associational significance: The attribution of local significance to the place for an association with Thomas Wills is also questioned.*
- 127 Response: While there is historical evidence that Tom Wills had a direct involvement in the Richmond Cricket Ground, this connection was possibly not sufficiently sustained to warrant Criterion H. This element of significance should be removed.
- 128 In the response to the RFC submission, some amendments were recommended to the Statement of Significance. The updated Statement of Significance is included below at Paragraph 131. The changes are shown tracked, and highlighted yellow.
- 129 In preparing this statement of evidence, I noted that one matter raised in the RFC submission was only partially responded to in the GML response. The matter raised related to one aspect of the Punt Road Oval identified in the Statement of Significance as contributing to the significance of the place,

The restriction of built form to the west and north boundaries of the ground

- 130 The submitter noted that: 'We don't believe the Context report provides sufficient detail as to the significance of this aspect of the place, which is not an element or physical feature but a comment on the way the site has evolved.'
- 131 I note that the dot point in the Statement of Significance, under the 'What is significant?' heading is not clearly expressed. This aspect of significance is sufficiently covered in the fourth dot point of the Statement of Significance. The point referring to the restriction of built form on the west and north boundaries of the ground should be deleted from the Statement of Significance.
- 132 The subsequent change to the updated Statement of Significance is included below at Paragraph 133. The change is shown tracked, and highlighted green.

- 133 Updated Statement of Significance:

What is significant?

The Punt Road Oval (Richmond Cricket Ground) at Punt Road, East Melbourne, which was cleared, levelled and fenced in 1856 and used for the first time as a **cricket sporting** ground in November 1856, is significant.

Elements that contribute to the significance of the place include (but are not limited to):

- the oval **(the fabric and the specific configuration of the oval are not of significance)**
- grassed embankments on the south and east sides and at the southeast corner of the ground
- ~~• the restriction of built form to the west and north boundaries of the ground~~
- open sides to the ground and transparent perimeter fencing on the east (Punt Road) and south (Brunton Avenue and railway line) boundaries
- the landmark qualities of Punt Road Oval
- the Jack Dyer Stand (1913–14) and 1927 west wing addition.

Elements that contribute to the significance of the Jack Dyer Stand include (but are not limited to):

- the building's original curved plan form, materials and detailing, built to the design of architects Thomas Watts & Son
- the 1927 west wing addition built to the design of architect Frank Stapley
- the building's relatively high integrity to its early design to all elevations
- the hip and gabled roof form
- the pattern and size of original fenestration; **and**
- slender cast iron and timber columns, decorative timber brackets and timber fretwork frieze, gable end details, and vents; and**
- other decorative details.**

More recent buildings, including the administration building, the David Mandie Building, and the remnant red brick building, are not significant. The fabric of recent landscaping such as

the cyclone wire fencing and gates around the perimeter of the ground, the pipe rail fencing around the oval, and the northeast corner wall and the Spotted Gum in the southeast corner of the ground are not significant.

More recent alterations and additions to the Jack Dyer Stand, including changes at podium level, modern external stairs, new openings in the curved north elevation, and commentary box within the stadium seating area are not significant.

How is it significant?

Punt Road Oval (Richmond Cricket Ground) at Punt Road, East Melbourne, is of local historical, representative, aesthetic, social, and associative significance to the City of Melbourne.

Why is it significant?

The Punt Road Oval, occupying the Traditional Country of the Wurundjeri Woiwurrung people of the East Kulin Nation, is of historical significance as part of the former Richmond Paddock (Yarra Park), which was used as an East Kulin living area, *ngarrga* and ceremonial ground, both prior to the British colonisation of Port Phillip and during the early settlement period in the 1830s and 1840s. It was used as a *ngarrga* and ceremonial ground in the 1840s. (Criterion A)

The Punt Road Oval, as part of the former Richmond Paddock (Yarra Park) that was set aside in 1837, is of historical significance for its use for the policing and administrative purposes of the colonial government of the Port Phillip District. From 1837, the wider area was used by Police Magistrate William Lonsdale, by the Mounted Police and the Native Police, and by officers of the Port Phillip Aboriginal Protectorate. (Criterion A)

The Punt Road Oval is of historical significance as an early cricket ground in Melbourne that was established in 1853 and used by the Richmond Cricket Club from 1856. It was used as a cricket ground for over 150 years **until 2011** and was the venue for significant events including interstate matches and as a training ground for the Aboriginal Cricket Team in 1867–68. (Criterion A)

The Punt Road Oval, established as the Richmond Cricket Ground in 1853, is of historical significance for its use as an early football ground from 1860 and its association with the early Richmond football team from that time, and for its earlier role in the development of the code of Australian Rules football in 1858; as the home ground for the present Richmond Football Club from 1885 to 1964 and for its use (up until the present time) as the club's training ground and administrative centre. The development of the ground from 1907 when the club was accepted into the Victorian Football League, and through the early and mid-twentieth century, reflects the significant growth in membership of the Richmond Football Club over this time and the growing spectator base for Richmond home games. This period saw the construction of a large Edwardian grandstand in 1913–14 (named the Jack Dyer Stand in 1998), built to a design by architects Thomas Watts & Son and extended in 1927 to

a design by architect Frank Stapley; a second grandstand, the Members Stand (later named the EM King Stand), erected in 1937–38 and since demolished; and other changes to the ground over time. (Criterion A)

The brick Edwardian-era Jack Dyer Stand is of representative significance as an example of the larger and more elaborate football stands that emerged in the late nineteenth century and early twentieth century. It retains key distinguishing features of its original 1913 design by Thomas Watts & Son and the matching 1927 extension designed by architect Frank Stapley. The stand is distinguished from the earliest known grandstand designed by Thomas Watts which is at Maryborough (1895) by its curved plan. The curved plan form is not typical for grandstands of this era. An earlier example is the 1909 Ald Gardiner Stand, Princes Park. (Criterion D)

The Punt Road Oval, as part of the former Richmond Paddock (Yarra Park) set aside in 1837, is of social significance for its important associations with the Aboriginal history of Melbourne; this includes being part of the wider Richmond Paddock that was a traditional East Kulin living area, and *ngarrga* and ceremonial ground that continued to be used as such into the 1840s, and being occupied by the Native Police Corps as a site for police training and police barracks. The Punt Road Oval, formerly the Richmond Cricket Ground, is also significant for its use as a training venue in 1867–68 for the Aboriginal Cricket Team made up of men from different parts of Victoria, and its current use as a training centre for Indigenous youth. (Criterion G)

The Punt Road Oval is of social significance for its long association with the Richmond Football Club, which used the oval as its home ground from 1884 until 1965; for its use by Richmond Football Club as a training ground and administrative centre from 1965 until the present day; and for its association with earlier Richmond football teams that also used the ground from 1860. The community for whom the place is significant includes members and supporters of the Richmond Football Club; past and present players, coaches and staff of the Richmond Football Club; residents of Richmond; and Melburnians more broadly. This community has had a strong attachment to the place for over 130 years. This attachment is strengthened by the strong and distinctive community identity of Richmond though much of the twentieth century. This was heavily anchored in local working-class politics that promoted fierce loyalty and physical toughness, which translated easily to football—for many Richmond supporters, ‘Tigerland’ is another name for Richmond. The social significance of the place as the former home ground of the Richmond Football Club resonates in the continued use of the ground for training; as the site of post-grand final premiership celebrations; and its powerful symbolic meaning to Richmond residents and followers of the Richmond football team who regard the ground as the spiritual home of the club. Its resonance is strengthened by the ground’s presence and visibility in the urban landscape, visually prominent in views from major transport corridors (Punt Road, Brunton Avenue, the multi-track railway line and Richmond Railway Station) and within Yarra Park, making it a prominent landmark in the local area for residents of Richmond and Melburnians more generally. The Richmond Cricket Ground is also of potential social significance to players,

coaches and other staff, members and supporters of the Richmond Cricket Club, which was based at the ground for over 150 years—from 1854 until relocating to Waverley Park in 2011. (Criteria E and G)

The Punt Road Oval is of significance for its association with champion Richmond footballer John ('Jack') Raymond Dyer (1913–2003). Nicknamed Captain Blood, Dyer was captain–coach of Richmond in the 1930s and 1940s and one of the greats of the game, recognised for his strategic play, fine marking and straight kicking. He was selected numerous times for the Victorian team and was inducted into the Australian Football Hall of Fame. A bronze statue of Dyer was erected outside the ground in 2003 and the 1913–14 grandstand was named in his honour in 1998. (Criterion H)

The Punt Road Oval is of significance for its association with Thomas Wentworth Wills (1835–1880), first class cricketer and co-founder of Australian Rules football. Wills was a member of the Richmond Cricket Club and one of its leading players in the 1850s and 1860s; he was also selected for intercolonial matches. In 1858–59 he was a co-founder of a new code of football suitable for conditions in the Colony of Victoria. Initially known as Melbourne rules football and later as 'Australian rules', this was the first game of football in the world to be formally codified. (Criterion H)

5.3 Submission 7—National Trust of Australia (Victoria)

- 134 Submission 7 from the National Trust of Australia (Victoria) (letter dated 5 April 2022) in relation to Punt Road Oval, strongly supports the findings of the Punt Road Oval Heritage Review October 2021, including the proposed statement of significant and assessment of significance under Criteria A (historic), D (representative), G (social) and H (associative).
- 135 I make no further comment in relation to heritage matters as a result of submission 7.

5.4 Submission 9—Department of Transport

- 136 Submission 9 from the Department of Transport (Head, Transport for Victoria (HTfV)) (letter dated 27 July 2022) identifies anomalies in the Melbourne planning scheme. The submitter notes that the planning scheme map for Punt Road Oval 'includes land currently declared as arterial road but incorrectly zoned on the planning scheme map as Public Park and Recreation Zone (PPRZ)' (Submission 09).

- 137 The areas affected are at the southeast corners of the Heritage Overlay HO1400 for Punt Road Oval, at the Punt Road and Brunton Avenue corner, and are indicated in the HTfV submission:

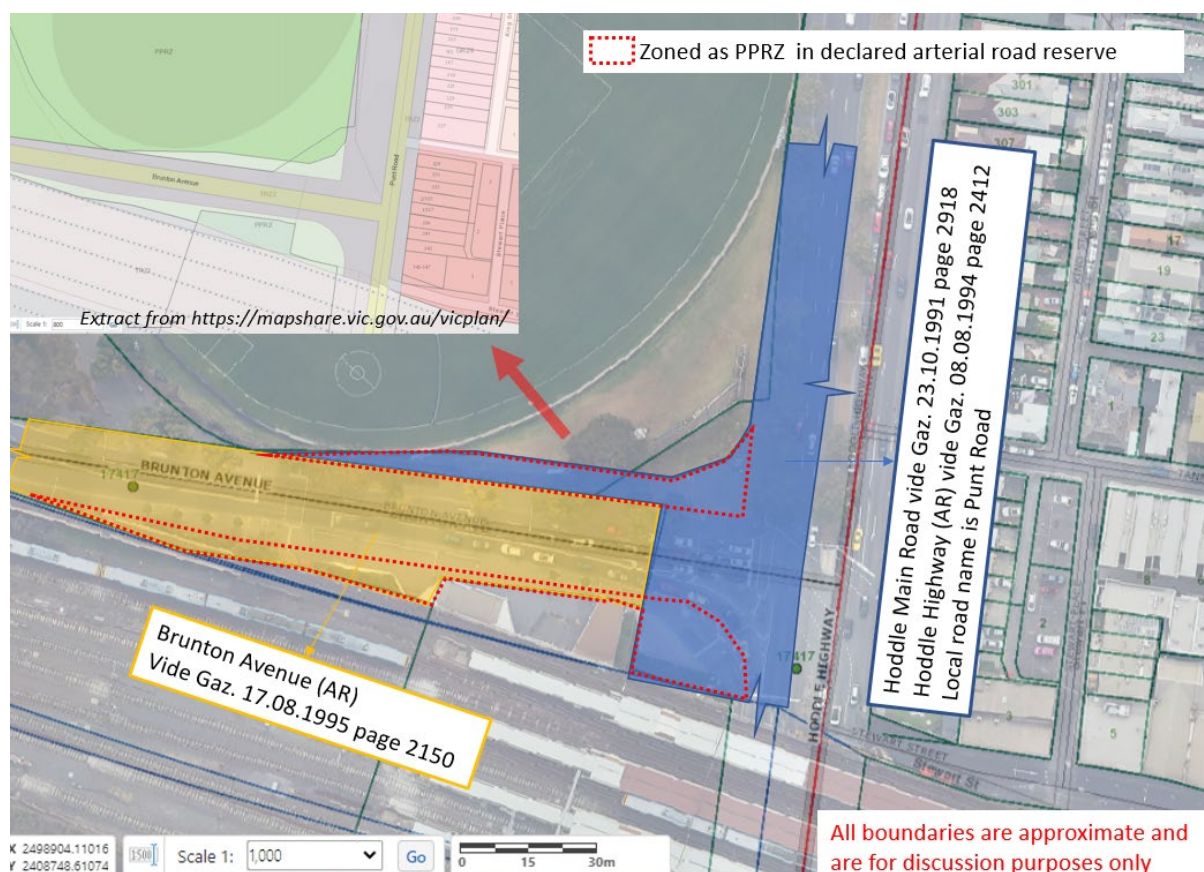


Figure 25. (Source: Amendment C405melb, Submission 09)

- 138 Having regard to the confirmation of the zoning of the land and land ownership status, HTfV notes that the current cyclone fencing surrounding oval grounds encroaches within the declared road reservation of Punt Road and Brunton Avenue.
- 139 The HTfV requests that the planning scheme anomalies be corrected as part of the amendment.
- 140 Notwithstanding the anomalies identified, the submitter acknowledges that the oval, the grassed embankments on the south and east sides and at the southeast corner of the ground, and open sides to the ground and transparent perimeter fencing on the east (Punt Road) and south (Brunton Avenue and railway line) boundaries have been identified in the Heritage Review as contributing to the local heritage significance of Punt Road Oval.

- 141 To this end, HTfV supports the planning scheme amendment, including the proposed modifications to the HO curtilage, on the basis that permit exemptions will apply to certain uses, buildings and works under other clauses in the Planning Scheme (Clauses 36.04, 43.01, 62.01 and 62.02 are noted in the submission).
- 142 I make no further comment in relation to heritage matters as a result of submission 9.

6 Conclusion and recommendations

- 143 It is my opinion that:
- Punt Road Oval (Richmond Cricket Ground) is of local heritage significance (individual place) to the City of Melbourne. It meets the threshold for local heritage significance under Criterion A, Criterion D, Criterion E, Criterion G and Criterion H.
 - The methodology, analysis and assessment of significance carried out in the Heritage Review appropriately support the identified significance of Punt Road Oval (Richmond Football Ground).
 - The Statement of Significance prepared, as set out in paragraph 133, appropriately identifies the features of the place that are significant, and appropriately justifies the significance of the place against the relevant heritage criteria.
 - Other than the recommended changes to the citation, as set out in paragraphs 100, 110 and 115, no further changes are recommended to the place citation.

Appendix A

144 Curriculum Vitae for Christina Dyson



Heritage is about culture. Not only the things we want to keep, but a much deeper reflection of who we are and what we value in our lives and communities.

Dr Christina Dyson

Senior Associate

Christina is a landscape heritage specialist, with particular expertise in twentieth century Australian plant gardens. She has wide experience in Australian garden, designed landscape and cultural landscape heritage, as well as urban and built heritage, at world, national, state and local levels. She has particular interest in and aptitude for the assessment and management of complex cultural landscapes.

Christina holds a PhD from the University of Melbourne (Melbourne School of Design). Her thesis investigated postwar Australian plant gardens and their connections with national identity.

At GML Christina has worked on a diverse range of cultural landscape and built heritage projects, including conservation management plans, landscape heritage assessments, and heritage impact statements. She has also worked on numerous municipal heritage studies and heritage advice projects. She has appeared at panel as an expert witness for planning scheme amendments related to gardens and designed landscapes of local and state cultural heritage significance.

Qualifications

PhD, Faculty of Architecture, Building and Planning, The University of Melbourne

Graduate Diploma in Horticulture, Burnley, The University of Melbourne

Bachelor of Arts (Hons.) in Art History & Theory and English Literature, The University of Sydney

Professional affiliations

Australia ICOMOS (Full International Member)

Chair, Victoria's Heritage Restoration Fund, Committee of Management (2016–)

Director, National Trust of Australia (Victoria) Board (2015-2021)
Chair, Buildings & Estates Committee, National Trust of Australia (Victoria) (2015-2021)

Deputy Chair, Heritage Advocacy Committee, National Trust of Australia (Victoria) (2015-2021)

Experience

Landscape and garden heritage

- Royal Park Conservation Management Plan incorporating Aboriginal cultural values—Client: City of Melbourne, current
- Victoria's Avenues of Honour Project—Client: Department of Premier and Cabinet (Veterans Branch), 2021
- Eastern Town Hall Gardens and Environs, Ballarat East Conservation Management Plan—City of Ballarat, 2020
- Abbotsford Convent Fernery garden bed rejuvenation, garden design and heritage advice—Client: Abbotsford Convent Foundation, 2020
- Former John Smith & Sons Riddell's Creek Nursery Interpretation Plan—Client: David Liebich, 2020
- Penders Park, Thornbury Design review and heritage advice—Client: City of Darebin, 2020
- Kingston and Arthur's Vale Heritage Area, Norfolk Island, Cultural Landscape Management Plan—Client: Department of Infrastructure, Regional Development and Cities, 2019
- Ballarat East Town Hall Gardens Heritage Assessment—Client: City of Ballarat, 2018
- Brechin Gardens, Narre Warren Conservation Management Plan—Client: City of Casey, 2016
- Camperdown Botanic Gardens Conservation Management Plan—Client: Corangamite Shire Council, 2016
- Maranoa Gardens, Balwyn, Conservation Management Plan—Client: City of Boroondara (Richard Aitken Pty Ltd, Lee Andrews & Associates and Christina Dyson), 2015

Management plans

- Puckapunyal Military Area Heritage Management Strategy (Cantonment)—Client: Department of Defence, current
- RMC Duntroon Heritage Management Plan—Client: Department of Defence, current
- Brighton General Cemetery Conservation Management Plan—Client: Southern Metropolitan Cemeteries Trust, 2020
- St Kilda Cemetery Conservation Management Plan—Client: Southern Metropolitan Cemeteries Trust, 2019

- Abbotsford Convent Conservation Management Plan Project—Client: Abbotsford Convent Foundation, 2019
- Fawcner Memorial Park Conservation Management Plan—Client: Greater Metropolitan Cemeteries Trust, 2017
- The Meeting Place Precinct, Botany Bay National Park, NSW, Conservation Management Plan—Client: Office of Environment and Heritage, 2008
- Ranelagh Estate Conservation Management Plan—Client: Mornington Peninsula Shire, 2008
- Lake Burley Griffin & Adjacent Lands: Heritage Assessment & Management Plan (led by Godden Mackay Logan)—Client: National Capital Authority, 2006
- Parliament House Vista Management Plan (led by Duncan Marshall)—Client: National Capital Authority, 2006
- Kosciuszko National Park Huts Conservation Plan (with GML)—Client: NSW National Parks and Wildlife Service, 2005

Heritage impact assessments

- Ryder Pavilion, Royal Park, Parkville Heritage Impact Statement—Client: City of Melbourne, 2022
- Brens Pavilion, Royal Park, Parkville Heritage Impact Statement—Client: City of Melbourne, 2021
- Western Pavilion, Royal Park, Parkville Heritage Impact Statement—Client: City of Melbourne, 2020
- The Gong Reservoir, Buninyong Botanic Gardens Heritage Impact Statement—Client: City of Ballarat, 2020
- Former Smiths Nursery, Riddells Creek, Heritage Impact Statements—Clients: Urban Design and Management and various private owners, 2016–2019

Expert evidence

- 2-14 Monbulk Road, Belgrave Expert Evidence, VCAT—Client: Yara Ranges Shire, 2021
- 60-70 Kunyung Road, Mt Eliza Expert Evidence, VCAT—Client: Mornington Peninsula Shire, 2021
- Mervyn Davis garden, 6 Fairview Street, Hawthorn Expert Evidence, Amendment C284—Client: City of Boroondara, 2019
- Clover Cottage and Garden, Berwick, Statement of Evidence, Casey Planning Scheme Amendment C231—Client: City of Casey, 2018
- East West Link Planning Panel, for Precinct 3: Royal Park (Western Portal), Expert evidence in relation to Royal Park, Parkville—Client: City of Melbourne, 2014

Heritage studies, assessments and advice

- Mildura Heritage Study Part B Stage 2—Client: Rural City of Mildura, current
- RMC Duntroon Heritage Advice—Client: Department of Defence, 2022
- Balwyn Heritage Study Peer Review Stage 3—Client: City of Boroondara, current
- Wattle Road, Hawthorn Heritage Review—Client: City of Boroondara, current
- St James Park, Hawthorn—Client: City of Boroondara, 2022
- Elwood Precinct (HO8) Stage 1 Heritage Review—Client: City of Port Phillip, 2021
- Punt Road Oval (Richmond Cricket Ground) Heritage Review—Client: City of Melbourne, 2021
- Mildura Heritage Study Part B Stage 1—Client: Rural City of Mildura, 2020–2021
- Hoddle Grid Heritage Review—Client: City of Melbourne, 2018–2020

- Boroondara Municipal Wide Heritage Gap Study Stage 2—Client: Boroondara City Council, 2016–2020
- City of Manningham Heritage Advisor—Client: City of Manningham, 2018–2019
- Moonee Valley 2017 Heritage Study—Client: City of Moonee Valley, 2019
- Johnston Street Signalisation Project, Abbotsford Convent—Client: Abbotsford Convent Foundation (led by Urban Initiatives), 2018
- Heritage advice (built form, landscape & horticultural heritage) and heritage assessments of individual places and precincts for various municipal councils including the cities of Boroondara, Moreland, Melbourne, Moonee Valley, Casey, Yarra, Knox, and Cardinia Shire, 2015–present
- Royal Park, Parkville, Cultural Heritage Significance Assessment—Client: City of Melbourne (for Christina Dyson), 2013
- Cardinia Shire Heritage Study Review, Stages 1 & 2—Client: Shire of Cardinia, 2006, 2008
- Darebin Heritage Study—Client: City of Darebin, 2007
- Glenferrie Sports Ground & Grace Park Precinct Heritage Assessment—Client: City of Boroondara, 2006

Professional background

Senior Associate, GML Heritage (formerly Context), 2020–current
Associate, Context, 2016–2020

Senior Consultant, Context, 2015–2016

Co-editor Australian Garden History, Australian Garden History Society, 2008–2015

PhD candidate, Melbourne School of Design, University of Melbourne, 2008–2015

Heritage Consultant, Context, 2006–2009

Heritage Consultant, Godden Mackay Logan (now GML Heritage), 2000–2006

Awards

Winner, 2013 Mike Smith Prize by the National Museum of Australia and the Australian Academy of Science, for an unpublished essay on an aspect of Australian environmental history, 2013

Winner, Energy Australia National Trust (NSW) Heritage Awards: Conservation Management Plan category, for Lake Burley Griffin & Adjacent Lands—Heritage Assessment & Management Plan, 2010

Winner, Energy Australia National Trust Award NSW – Conservation Management Plan Award, for The Meeting Place Precinct, Botany Bay National Park, NSW, Conservation Management Plan, 2009

Winner, PIA NSW Planning Excellence Award – Heritage, for The Meeting Place Precinct, Botany Bay National Park, NSW, Conservation Management Plan, 2008

Winner, PIA Victoria Planning Excellence Award – Heritage, for Ranelagh Estate: Conservation Management Plan, 2008

Winner, Energy Australia National Trust NSW Heritage Awards – Conservation Management Plan, for Kosciuszko National Park Huts—Conservation Strategy, 2006

Conference papers, presentations and lectures

Dyson, C, guest lectures: 'Cultural Landscapes' and 'Cultural landscape heritage: identifying, understanding, conserving, managing', Masters of Urban and Cultural Heritage (Intensive), The University of Melbourne, September 2021.

Dyson, C, Guest Lecture, Masters of Urban and Cultural Heritage (Intensive), The University of Melbourne, September 2021.

Dyson, C and Jackson, R, 'Management of the Kingston and Arthur's Vale Historic Area's cultural landscape', conference paper for Culture: Conserving it Together, ICOMOS Conference, Fiji, October 2018

Dyson, C, 'Frederick S Tuckfield of Clover Cottage, Berwick: Camellia Grower', presentation to the Camellia Ark Project annual meeting in Mooroolbark, 9 September 2018

Dyson, C, 'Planting identity: wildflowers in the suburbs', presentation to the Lyceum Club, Melbourne, 3 September 2015

Dyson, C, 'A history of gardening with Australian plants', presentation to Garden Ambassadors, Royal Botanic Gardens Cranbourne, 13 July 2015

Dyson, C, 'History Saves Landscapes', presentation at 'Cultivating Community: Garden making and public history' (speakers Richard Aitken, Christina Dyson, and Sharon Willoughby), Making Public Histories Seminar Series, an initiative of the Institute of Public History, Monash University and the State Library of Victoria, State Library of Victoria, 25 September 2014

Dyson, C, 'Heritage Saves Landscapes', guest lecture, Urban and Landscape Heritage (Masters elective), Melbourne School of Design, Faculty of Architecture, Building and Planning, The University of Melbourne, 24 September 2014

Dyson, C, 'Manipulating History: The Natural Australian Plant Garden, 1945–1985', Second World Congress of Environmental History, 8–12 July 2014, Guimarães, Portugal, hosted by the University of Minho and the International Consortium of Environmental History Organizations

Dyson, C, Guided 'Walk and talk', Royal Park, Parkville, Melbourne for the Australian Garden History Society (Victorian Branch), February 2013

Memberships

ICOMOS (International Council on Monuments and Sites)

National Trust of Australia (Victoria)

Australian Garden History Society (Honorary Life member)

Articles, books and reviews

Dyson, C, 'Rethinking Australian natural gardens and national identity' in James Beattie (Ed.), *Gardens at the Frontier: New Methodological Perspectives on Garden History and Designed Landscapes*, Routledge, 2018

Dyson, C, 'Rethinking Australian natural gardens and national identity, 1950–1979', in *Studies in the History of Gardens and Designed Landscapes: An International Quarterly*, 36 (1), 2016, pp 53–64

Dyson, C, 'Book Review: Peggy James, *Cosmopolitan Conservationists: Greening Modern Sydney*', in *Historical Records of Australian Science*, 24 (2) 2013, pp 344–346

Dyson, C, 'Living fossils and mouth-watering stones: manipulating history in the post-WWII natural Australian plant garden', unpublished essay awarded the 2013 Mike Smith Prize by the National Museum of Australia and the Australian Academy of Science

Dyson, C, 'Conserving significance within a context of change: a case study of the Glenferrie sports ground and Grace Park precinct', *Studies in Australian Garden History*, Vol. 3, 2012, pp 35–47

Dyson, C and Aitken, R, 'Honouring Nina Crone', *Australian Garden History*, 23 (3), January/February/March 2012, p 3

Dyson, C, 'Netscape: The Cultural Landscape Foundation', *Australian Garden History*, 25 (2), October/November/December 2013, p 22

Dyson, C and Aitken, R, 'Inviting gestures: scholarship, heritage, and advocacy', *Australian Garden History*, 24 (4), April/May/June 2013, pp 3–4

Dyson, C and Aitken, R, 'Reviewing the cultural history of gardens', *Australian Garden History*, 25 (1), July/August/September 2013, pp 3–4

Dyson, C and Aitken, R, 'Modernist gardens: conserving a vulnerable heritage', *Australian Garden History*, 25 (2), Oct/Nov/Dec 2013, p 3

Dyson, C, 'Notes from a hillside villa', *Australian Garden History*, 22(2), October/November/December 2010, p 32; 22(3), January/February/March 2011, p 25; 22(4), April/May/June 2011, pp 24–26; 23(1), July/August/September 2011, p 24

Dyson, C, 'Vulnerable scenery: the shifting dynamics of a natural aesthetic in Australian postwar gardens', conference paper, (Un)loved Modern, Australia ICOMOS Conference, Sydney, 7–9 July 2009

Dyson, C, 'Nation and garden design', *Australian Garden History*, 19(5), May/June 2008, pp 8–11

Vos, C, 'Designs on History' (conference report), *Australian Garden History*, 18(4), February/March/April 2007, pp 5–8

Appendix B

- 145 Select additional images from site inspections of Punt Road Oval (Richmond Cricket Ground) in June and July 2021.



Figure 26



Figure 27



Figure 28

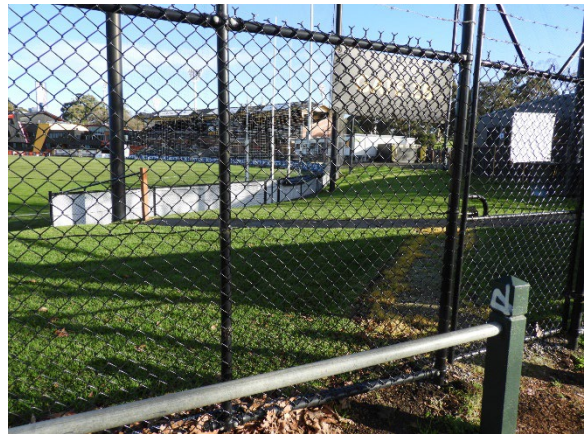


Figure 29

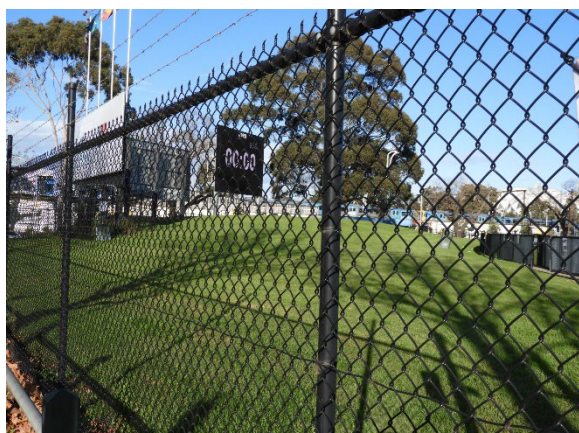


Figure 30



Figure 31

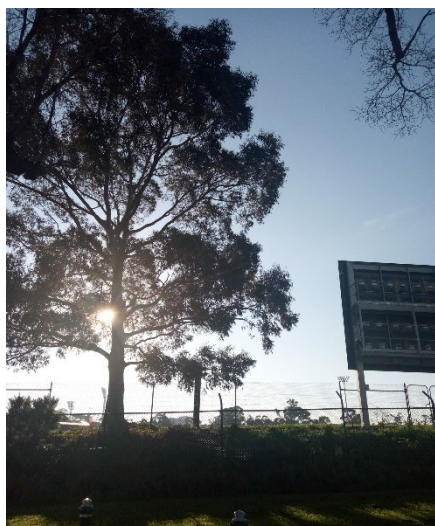


Figure 32



Figure 33

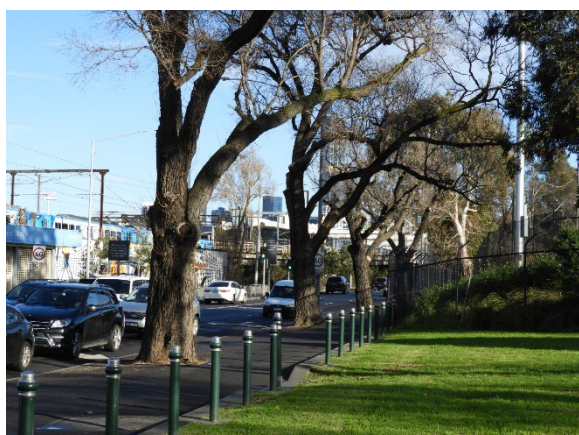


Figure 34

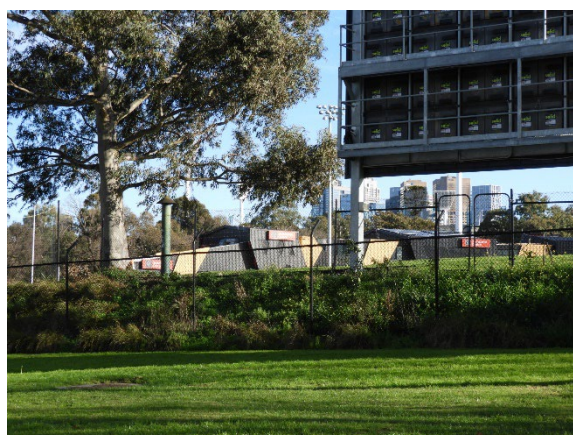


Figure 35



Figure 36



Figure 37



Figure 38



Figure 39



Figure 40



Figure 41

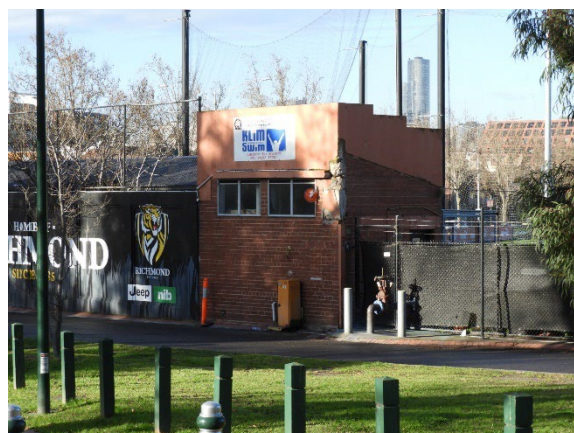


Figure 42



Figure 43