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**Subject:** Amendment C258: Heritage evidence relating to Melbourne Business School [KWM-Documents.FID2901957]  
**Date:** Monday, 4 February 2019 9:51:37 AM  
**Attachments:** [Supplementary statement - MBS - C258 Panel Raworth.pdf](#)

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Dear Panel Co-ordinator,

We continue to act for Melbourne Business School, a submitter in relation to Melbourne Planning Scheme Amendment C258.

Please find attached for filing the expert witness statement of Bryce Raworth, on which our client intends to rely at the upcoming Panel Hearing. We note the timetable (version 7) has "TBA" in relation to the witnesses to be called by Melbourne Business School. We confirm that it is only Mr Raworth to be called.

In accordance with the directions of 15 January 2019, this email and report is being circulated to all parties on the distribution list (version 6).

Regards  
Bridget

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Melbourne Business School  
Carlton

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

Bryce Raworth

Conservation Consultant and Architectural Historian

Prepared under instruction from King & Wood Mallesons

February 2019

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

February 2019

1.0 Introduction

1. This report was prepared under instruction from King & Wood Mallesons on behalf of the Melbourne Business School (MBS). MBS are the owners of the subject site comprising properties at: 183-189 & 193-195 Bouverie Street, 168 & 174-180 Leicester Street and 150-154 & 160-170 Pelham Street, Carlton.
2. I have been asked to provide comment on the heritage considerations associated with Amendment C258 to the *Melbourne Planning Scheme*, which proposes, amongst other changes, to apply new heritage gradings to the subject site and update the heritage policy at Clause 22.05.
3. In accordance with my instructions, it is noted that the Panel Hearing for Amendment C258 commenced on 6 August 2018 with Council's Part A Submissions. MBS subsequently presented its submissions and evidence, including my evidence in relation to heritage considerations and Andrew Biacsi's town planning evidence on 15 August 2018.
4. Council presented its Part B Submissions on 28 August 2018, at which time it tendered the following documents:
  - (a) Document 49 – Provided as evidence of Council's methodology when translating the properties in City North. The document is correspondence dated 18 December 2012 from RBA Architects + Conservation Consultants Pty Ltd (RBA) to Council, in which RBA confirmed that its approach in the earlier City North Review was consistent with other planning schemes by grading A to C properties as Significant and D properties as Contributory. This was in the context of individually significant properties in City North. Council then took this 'methodology' and applied it to the heritage inventory in City North for the purpose of Amendment C258, including to heritage places within precinct.
  - (b) Document 50 – Provided to correct errors in the application of Council's methodology for the following MBS properties:
    - (i) 174-180 Leicester Street was mistakenly translated to Contributory when it should be Significant; and
    - (ii) 183-189 Bouverie Street was mistakenly translated to Contributory when it should have been removed from the Heritage Inventory entirely.

5. King & Wood Mallesons wrote to the Panel by letter dated 30 August 2018, expressing MBS's dissatisfaction with the late production of material and requesting the opportunity to be heard on these matters again. In correspondence from the Panel, dated 3 and 21 September 2018, the panel has provided MBS with the opportunity to make further written submissions and to request to present further evidence, and this has subsequently been agreed to by the Panel.
6. I have been instructed to provide my opinion as to whether Amendment C258 is appropriate in terms of the issues that have arisen from the tendering of Documents 49 and 50 to the Panel, in particular:
  - (a) The regrading of 174-180 Leicester Street, which is now proposed to be Significant rather than Contributory (Document 50);
  - (b) The methodology that Council has relied on for the grading of properties in City North (Document 49); and
  - (c) Any other matter which I regard as relevant, stating clearly the basis of my views.
7. This statement has been prepared with assistance from Martin Turnor of my office. The views expressed are my own.

## 2.0 Sources of Information

8. The analysis below draws upon inspections of the subject site, and a review of the relevant Amendment C258 documentation, including the *City of Melbourne Heritage Review: Local Heritage Policies and Precincts Statements of Significance Methodology Report* (Lovell Chen, Updated May 2016). Reference has also been made to the *Melbourne Planning Scheme's Heritage Places Inventory* (March 2018), the *City North Heritage Review 2013 Statements of Significance (Revised June 2015)* and the current Heritage Overlay provisions in the *Melbourne Planning Scheme* (Clauses 43.01 and 22.05). A statement of evidence of Peter Lovell, prepared in relation to the significance of the buildings in question and dated April 2014, has also been reviewed along with the Panel Reports for Amendments C196 and C198 to the *Melbourne Planning Scheme* and the *City North Structure Plan* (2012).
9. The Amendment C258 documentation, including a corrected version of the *Heritage Places Inventory*, was re-exhibited in November 2017. Council made a range of changes to the C258 Amendment documentation, including Clause 22.05, as a result of submissions received, and these were adopted as a result of the Future Melbourne Committee Resolution of 20 February 2018. These changes have been reviewed, as has Council's Part A Submission.
10. I have also had regard for Documents 49 and 50, as described above.

### 3.0 Author Qualifications

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

### 4.0 Declaration

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

A handwritten signature in black ink, appearing to read 'B. Raworth', with a stylized flourish and a period at the end.

**BRYCE RAWORTH**

5.0 Discussion

*The methodology that Council has relied on for the grading of properties in City North*

13. Submissions by letter dated 30 August have been made by MBS in relation to the methodology that Council has relied on for the grading of properties in City North as evidenced by Document 49 tendered by Council.
14. Document 49 comprises email correspondence dated 18 December 2012 from RBA Architects + Conservation Consultants Pty Ltd (RBA) to Council, in which RBA confirmed that its approach in the earlier *City North Heritage Review* was consistent with other planning schemes by grading A to C properties as Significant and D properties as Contributory. This was in the context of individually significant properties in City North. Council then took this 'methodology' and applied it to the heritage inventory in City North for the purpose of Amendment C258, including to heritage places within precinct.
15. I have reviewed Document 49 and believe that it provides little certainty in relation to, and in support of, the methodology that lay behind the *City North Heritage Review* and the subsequent translation of gradings by Council officers.
16. The email states that the approach taken is consistent with that used in other planning schemes, where A to C are significant and D are contributory. The email goes on to state that this is essentially the case with the City of Melbourne grading system, ie the existing Clause 22.05, when by definition it is not and in fact C grade buildings are clearly identified as 'contributory'. At best, the email discussion is confused in content and does not provide a convincing basis for advice on matters relating to gradings.
17. This said, the email goes on to discuss some buildings that in 2012 had existing Heritage Overlays but were graded C or D. It is apparent that the force of the email trail/exchange is to determine whether these existing controls can be justified or should be deleted. The discussion about C and D buildings might be seen as an exploration of the manner in which these might or might not be justified, with D buildings being upgraded to C, and C being notionally 'significant'. This is far from a discussion on a 'first principles' basis of how gradings might be applied, or translated, but rather a discussion that seeks to find a solution to a particular problem, ie whether the retention of controls over existing HOs of low gradings is warranted. It is a discussion in which the cart is being used to drive the horse.
18. Inter alia, the C198 Panel made the following observations:

*The Council's experts advised that their instructions were to use the grading system as it stands; however they noted that a 'conversion system' to accommodate the need to adopt to the standard grading system (included in PN01) "should be kept in mind". In essence this equated:*

- A, B, or C with 'significant'
- D with 'contributory'
- Ungraded with 'non-contributory'

*Mr Hemmingway in his evidence-in-chief explained that, in accordance with the Study Brief, the study team adopted the principle that only D graded sites within a precinct would be graded. If they were outside the precinct they were regraded A, B or C or would be ungraded. Council directed that any existing individual buildings with a D grade would be removed from the Heritage Overlay. If it was regarded as a C graded building it could stay in the Heritage Overlay.*

...

*Mr Beeston confirmed that although he usually undertakes heritage studies using the 'significant' and 'contributory' model, he was instructed to use the grading model that the Council has used for the last 30 years. He confirmed that although the Practice Note advises that the letter grading system should not be used, he was confined by the Study Brief and he "can work with both systems".*

19. In summary, the RBA advice seems ambiguous in many respects, particularly as it applies to buildings within the precincts (rather than the buildings subject to individual overlays, which were the subject of the 2012 email). Mr Beeston states that he was instructed to use the existing system, and the Panel found that it was constrained to assess against the existing system. For Council to subsequently implement the translation process in this other manner seems inconsistent with the intent of both Mr Beeston (as previously instructed by Council) and of the Panel.
20. Moreover, given the intent to have a uniform system, Lovell Chen, having rejected the RBA approach, should have been given the material to review. It should not have been a matter of Council officers interpreting and implementing a system that had been rejected by the lead consultants, Lovell Chen.
21. Overall, we are left with a very confused picture of how the grading system was applied by RBA. However, to the extent that the Panel ruled on RBA's findings, they did so in the context of the primacy of the existing grading system, where C grade buildings are contributory. Having regard for this, Council's proposed translation of C gradings to 'significant' is not appropriate, and a more selective and analytical approach to translating C gradings (ie some to significant, and some to contributory), as advocated by Lovell Chen, would be appropriate.
22. The Lovell Chen *Methodology Report*, page 11, provided the following commentary that is indicative of a more appropriate approach:
  - *The transfer to 'significant' is a relatively straightforward matter for all A and B properties, for all precincts (there are no A graded properties in Kensington).*
  - *In Parkville, the transfer is straightforward for all alphabetical gradings.*
  - *C grade properties require review in all precincts except Parkville (total of 2113 properties). Some of these properties appear to warrant a 'significant' grading, although the great majority will likely remain 'contributory'. Issues which warrant review include the C grading being given to a comparatively high number of properties from the early period 1850-75 (e.g. in Carlton, some 425 properties); interwar properties generally (161 properties across all precincts); and the very high proportion of C grade properties relative to other gradings in Carlton and North and West Melbourne. The work undertaken in preparing the precinct statements of significance also highlighted important themes and types of places in precincts, which is another consideration in reviewing the relative significance of places.*

23. It is of relevance that the email dated 18 December 2012 commences with a discussion that is flawed insofar as the author, quoting clause 22.05, states that A to D grade buildings are significant:

*As such, A to D grade buildings are significant. Hence ALA were able to recommend individual overlays for D graded sites on that basis.*

24. This is a misconstruction of the intent of the relevant passage from Clause 22.05, which when read in context should be understood to mean that all graded buildings *have* significance, not that they are all ‘significant’ (as opposed to ‘contributory’) in the context of a policy that differentiates between ‘contributory’ buildings and ‘outstanding’ buildings. The implication that D graded buildings are ‘significant’ does not override the sense that many if not all are by definition ‘contributory’ rather than of individual local significance.

25. Amendment C258 proposes the terms ‘significant’ and ‘contributory’ in place of ‘outstanding’ and ‘contributory’. The current definitions found in Clause 22.05 are as follows:

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

*Outstanding building means a grade A or B building anywhere in the municipality.*

26. The proposed definitions under Amendment C258 are as follows:

*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.*

*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.*

27. By and large, it is understood by most parties that D grade buildings, unless incorrectly graded, or unless already subject to a Heritage Overlay, are not individually significant. This Panel has heard some debate over the extent to which certain C grade buildings may or may not warrant translation to ‘significant’ status in this Amendment, but it is clearly not the case that the City of Melbourne and its consultants (Lovell Chen) have adopted the view that all D grade buildings might warrant ‘significant’ status. Yet this is a premise that is on first view accepted in the 18 December 2012 email.

28. In summary, while Document 49 provides some background to the manner in which RBA were working, and the grading methodology they were employing, it is



not definitive when read in the context of evidence given to the C198 Panel and the findings of that Panel.

*The grading of 174-180 Leicester Street*

29. As noted in my previous statement in relation to Amendment C258 and this Heritage Overlay precinct, this building was originally a knitting mill, constructed in 1940 to designs by architect Archibald Ikin. The Moderne style Leicester Street facade has bands of multi-pane steel-frame windows with continuous concrete hoods providing a horizontal emphasis. This is counterpoised by the vertical entrance bay with a parapet featuring typical Moderne style vertical ornament. The side elevations to Little Pelham Street have a utilitarian industrial character with plain face red brick walls and multi-pane steel framed windows. Double storey additions have been made to the rear in 1952 with exposed concrete frame and red-brick walls. The factory was extended further to the rear in 1964, again using red brick walls in a utilitarian design.
30. The façade is largely intact apart from overpainting of the tapestry brickwork. The original drawing shows terracotta cladding around the main entry, but this has been replaced (or covered) by mosaic tiles. Several of the original steel framed windows on the side elevation have been replaced with aluminium window frames.

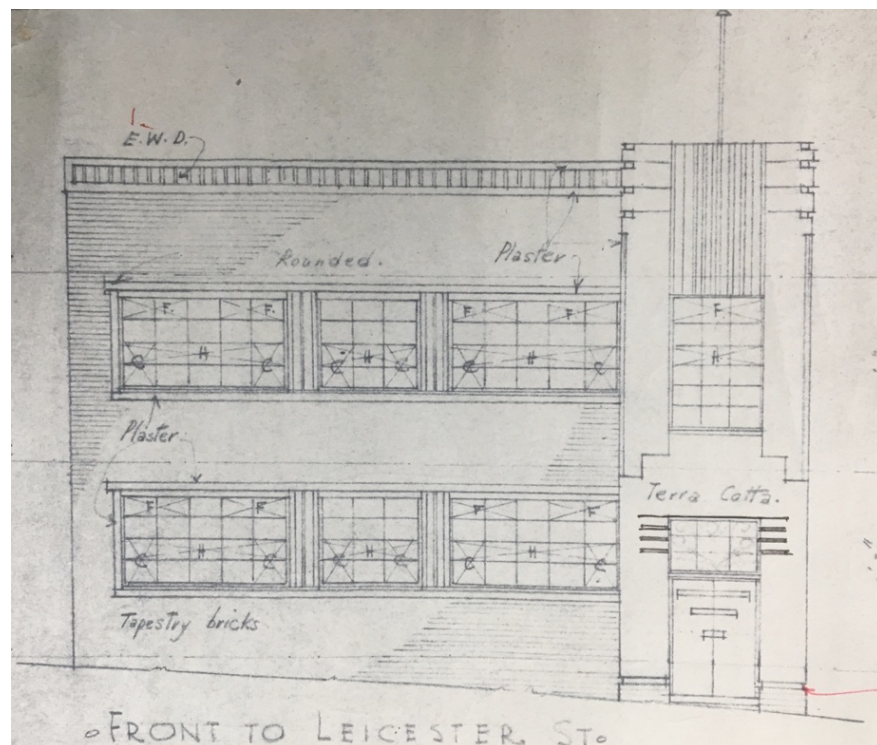


Figure 1 *The façade to 174-180 Leicester Street as shown on the 1940 permit drawings. Source: Public Records Office Victoria.*



Figure 2 Current photograph of the Leicester Street façade.

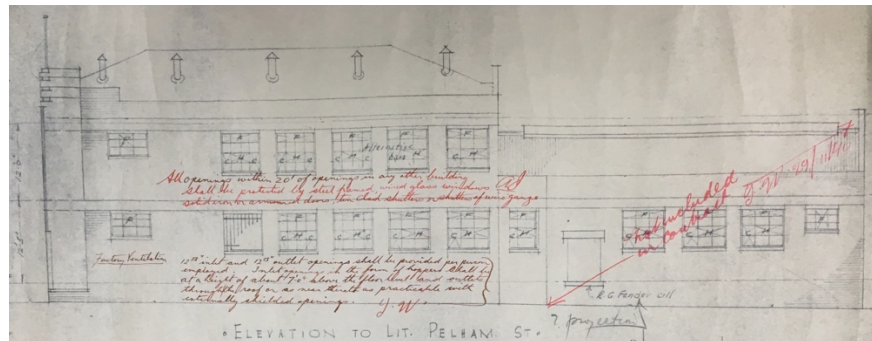


Figure 3 The Little Pelham Street elevation as shown on the 1940 permit drawings. Source: Public Records Office Victoria.



Figure 4 The Little Pelham Street elevation a showing the c1964 additions in the foreground.

31. The statement of significance for Little Pelham Street Precinct, as set out in *City North Heritage Review 2013 Statements of Significance (Revised June 2015)*, is as follows:

*What is Significant?*

*The land and the factory/warehouse buildings located in Bouverie Street (nos 193-195), Leicester Street (nos 168-172 and 174-178), and Pelham Street (nos 150-170) all of which back onto Little Pelham Street. Elements of note are the original external treatments such as face red and brown brick combined with areas of cement render and metal-framed, multi-paned windows.*

*How is it Significant?*

*The Little Pelham Street precinct is of historic significance to the City of Melbourne.*

*Why is it Significant?*

*The Little Pelham Street precinct is of historic significance for being illustrative of the industrial development that occurred in this part of Carlton and adjacent parts of Melbourne during the Interwar period and which radically transformed it from a largely residential suburb. At this time, there was extensive replacement of the pre-existing building stock, being mostly 19th century cottages and terrace houses with some small industrial sites, to larger scale factories and warehouses. (AHC Criteria A4).*

*The Little Pelham Street precinct is of representative aesthetic significance as a largely intact and a rare surviving cluster of light industrial buildings from the Interwar and Post-war periods (along with the Lincoln Square South Precinct). Although individual buildings undergone varying degrees of change and some are undistinguished examples, they are evocative of this key development phase, and in particular, Little Pelham Street provides a rare opportunity to experience a streetscape of mid-20th century buildings. Of this group of buildings, the most impressive is the Modern style, former factory (174-178 Leicester St) however the original detailing to the rear part of 193-195 Bouverie Street, where it is unpainted along Little Pelham Street is also noteworthy. (AHC Criteria D2)*

32. At the outset, it is noted that the C198 Panel found that the group was not of aesthetic interest, and this has implications for the manner in which 174-180 Leicester Street should be graded. While it was arguably reasonable for it to be identified as a C grade building in terms of the definitions currently found in Clause 22.05, it is not reasonable for this grading to be translated to 'significant' under Amendment C258. It is not of individual significance in terms of its historic values.
33. The precinct was listed on the Heritage Overlay in 2015 as part of Amendment C198 to the *Melbourne Planning Scheme*. MBS objected to the Amendment and engaged Peter Lovell to give expert witness at the C198 Panel hearing on their behalf. Peter Lovell's statement of evidence includes the following commentary on the significance of buildings on the subject site:

*174-180 Leicester Street:*

*... a relatively intact and representative example of a Moderne styled factory of the late interwar period. The façade design to Leicester Street displays the characteristics of the style as applied to both industrial and commercial buildings in the later 1930s. Its presentation has been compromised to a degree by the overpainting of the façade, but in this case the impact is not considered to be such that it fundamentally undermines an appreciation of the overall design of the building. The C grading proposed in Council's documentation is considered appropriate in relation to the front portion of the building, as is the ungraded status of the rear 1964 portion of the building.*

34. The C198 Panel was not persuaded by the evidence and submissions made on behalf of MBS regarding the Little Pelham Street Precinct and ultimately recommended that it be listed on the Heritage Overlay. That said, the Panel were of the view that the precinct could not be listed on the basis of aesthetic significance:

*In reaching its conclusion the Panel takes the view that [sic] of humble, ordinary or undistinguished architectural resolution can, nonetheless, display important historic or aesthetic (as for example landmarks or social reference points) significance. In this case the buildings involved are not of special architectural interest but rather represent a utilitarian aspect of Melbourne's growth.*

35. The conclusion of the C198 Panel that the Little Pelham Street Precinct was of no aesthetic significance can be taken as further evidence of the low heritage/aesthetic value of both 174-180 Leicester Street and 193-195 Bouverie Street, as well as the other buildings in the precinct.

36. The Panel noted the following in terms of gradings and their application:

*With regard to methodology, the Panel agrees with Mr O'Farrell that the principle consideration in this Amendment is the threshold of significance and whether a Heritage Overlay should be recommended to be applied to a place. However given the integration of the grading system embedded in the Planning Scheme through Clauses 22.04 and 22.05 and the Heritage Places Inventory, the Panel considers it is confined to consider the grading system used by the City of Melbourne.*

37. Council's *Heritage Place Inventory* (June 2016) graded the subject building as follows (based upon the *City North Heritage Review*):

*174-180 Leicester Street: C Grade Building, Level 2 Streetscape  
(excluding the rear of the site)*



38. As per the current Heritage Policy at Clause 22.05 of the Melbourne Planning Scheme, the relevant elements of the current grading scheme are defined as follows:

*‘C’ buildings. Demonstrate the historical or social development of the local area and /or make an important aesthetic or scientific contribution. These buildings comprise a variety of styles and building types. Architecturally they are substantially intact, but where altered, it is reversible. In some instances, buildings of high individual historic, scientific or social significance may have a greater degree of alteration.*

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

39. It is noted that prior to the implementation of Amendment C198, none of the buildings on the subject site were graded.
40. As part of Amendment C258 (which went on exhibition 30 March 2017) the City of Melbourne is proposing to replace the current A-D grading system with a system that utilises ‘significant’, ‘contributory’ and ‘non-contributory’ gradings. A draft version of the heritage inventory (revised post exhibition), using the new gradings system, identifies the buildings on the subject site as follows:

*174-180 Leicester Street:                      Contributory*

41. In relation to Council-tendered Document 50, Council now states that 174-180 Leicester Street was mistakenly translated to contributory when it should be significant.
42. This shift in status is argued on the basis that RBA had graded this building (and others in the City North area) having in mind an approach where buildings graded A to C were significant and D properties were contributory. The inappropriateness of this approach is discussed above and was subsequently critiqued by Council’s lead C258 consultants, Lovell Chen.
43. Council suggests this mistake arose as a result of the site having two listings, ie the site is part referenced in relation to the site at 193-195 Bouverie Street, as well as having its own listing.
44. I support the general thrust of the re-grading process proposed by Amendment C258, noting that this approach is recommended in the VPP Practice Note *Applying the Heritage Overlay* (January 2018). However, the Amendment has given rise to issues which have seen several of the MBS buildings re-graded in a manner that suggests their significance is greater than can readily be justified.
45. Since the 2016 Inventory was introduced as an incorporated document, 174-180 Leicester Street has had the status of a contributory building for the purposes of Clause 22.05. The history of its gradings is found in pages 8-10 of the City of Melbourne memorandum (Document 50).
46. Reviewing the building itself, it is a modest example of its period, of no particular individual architectural interest, displaying as it does only standard detailing for its period in a representative manner, and having been overpainting etc. In my view

a contributory listing would be more appropriate having regard for a first principles assessment of its interest, having regard for the findings of the Panel for C198, and having regard for the manner in which gradings have been applied across the municipality in the broader review (by Lovell Chen) and the desire for consistency in outcomes.

47. In relation to Lovell's evidence, the Panel observed:

*With regard to 168-172 Leicester Street, Carlton, the front portion of the building is currently included in Carlton HO1 (but individually ungraded). It is a former workshop of the 1920s but alterations to all elevations have significantly impacted its early design and understanding of its use. 174-178 Leicester Street, Carlton was constructed in 1940 with subsequent alterations, of a "relatively minor nature", in 1952 and 1964. The proposed C grading is considered appropriate. Likewise, Council took the absence of any reference in submissions to 174-178 Pelham (sic) Street, Carlton to be an acknowledgement by the owner of its heritage value (C grade).*

*...Although the precinct represents a coherent and identifiable group it is not persuaded of its aesthetic significance.*

*The Panel concludes that the precinct is of sufficient historical significance for inclusion in Heritage Overlay HO1151. It finds that the precinct lacks sufficient aesthetic significance for inclusion on that basis.*

*In reaching its conclusion the Panel takes the view that of humble, ordinary or undistinguished architectural resolution can, nonetheless, display important historic or aesthetic (as for example landmarks or social reference points) significance. In this case the buildings involved are not of special architectural interest but rather represent a utilitarian aspect of Melbourne's growth. The following buildings are considered of sufficient historical significance to apply the Heritage Overlay (HO1151):*

- 193-195 Bouverie Street, Carlton - as C2
- 168-172 Leicester Street, Carlton - as D2
- 174-180 Leicester Street, Carlton - as C2
- 160 (156) -170 Pelham Street, Carlton - as D2

48. A key observation is that the Panel found that the buildings in the group, collectively but also, by inference, individually, to not be of aesthetic significance. This is in effect recognising a lesser extent of significance than that opined in the RBA work.
49. It has previously been noted that the recommendations of the Panel regarding the statement of significance have not been fully implemented by Council. Similarly, the recommendation regarding 183-189 Bouverie Street as an ungraded building was not implemented, at least insofar as Amendment C258 was exhibited (this has been addressed by Council in submissions to the Panel).
50. The present proposal for an 'uplift' in grading of 174-180 Leicester Street seems inappropriate in the context of it having been found to be part of a group of historical interest only, not aesthetic interest. It is hard to see how this building would be construed as of individual significance on an historical level. In reality, the basis of its listing is its role as part of the collective or precinct, which is very clearly a significance that is contributory rather than individually notable.

51. The building at 174-180 Leicester Street does not meet the criteria for a significant place as defined in the Amendment C258 documentation:

*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.*

52. Once again, the building is not of individual significance in terms of its historic values. As I noted in relation to the building at 193-195 Bouverie Street, the subject building compares poorly with nearby interwar factories with a significant grading. The examples at 157-165 Pelham Street and 1-29 & 31-47 Barry Street are more intact, with more interesting and significant historical associations.



Figure 5 Former C Huppert & Co Factory, 157-165 Pelham Street, Carlton. Originally D graded, it was regraded C3 as part of Amendment C198 and given an individual HO listing. Proposed for a significant grading under Amendment C258.



Figure 6 Former Myer dispatch buildings, 11 and 31-47 Barry Street Carlton. They have site specific Heritage Overlays and are proposed for significant grading under Amendment C258.

53. Having regard for all the above, it is not appropriate for the status of 174-180 Leicester Street to be amended to 'significant', and its status of 'contributory' as exhibited, should remain in place. Document 50 does not provide a sufficient basis for implementing the uplift in significance status suggested by Council.



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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•Urban Design**, provides a range of heritage services, including the assessment of the significance of particular sites, preparation of conservation analyses and management plans, design and/or restoration advice for interventions into significant buildings, and detailed advice regarding the resolution of technical problems relating to deteriorating or damaged building fabric.

From 2004-2011 Raworth was a member of the Official Establishments Trust, which advises on the conservation and improvement of Admiralty House and Kirribilli House in Sydney and Government House and The Lodge in Canberra. As a member of the former Historic Buildings Council in Victoria, sitting on the Council's permit, planning and community relations committees, Raworth has been involved with the registration and permit processes for many registered historic buildings. In 1996 he was appointed an alternate member of the new Heritage Council, the successor the Historic Buildings Council, and in 1998 was made a full member. At present he provides regular advice to architects and private owners on technical, architectural and planning issues relative to the conservation and adaptation of historic buildings, and is occasionally called upon to provide expert advice before the VCAT. He is currently the conservation consultant for the cities of Kingston, Frankston and Stonnington.

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

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

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