

32 David Street, Brunswick

Expert Witness Statement to Panel
Amendment C174 to the Moreland Planning Scheme

Bryce Raworth

Conservation Consultant and Architectural Historian

Prepared under instruction from Equipe Lawyers Pty Ltd

April 2019

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1.0 Introduction

1. This report was prepared under instructions from Equipe Lawyers Pty Ltd for the owner of the subject site at 32 David Street, Brunswick. I have been asked to comment on the heritage considerations associated with the proposal to apply a Heritage Overlay to the site under Amendment C174 Moreland Planning Scheme.
2. This statement has been prepared with assistance from Martin Turnor of my office. The views expressed are my own.

2.0 Sources of Information

3. The analysis below draws upon inspections of the exterior and interiors of the subject building and a review of the Amendment C174 documentation, including versions of the citation for the subject site by Context Pty Ltd, which forms part of the *Moreland Heritage Gaps Study* (Context Pty Ltd, draft 2017/2018). Previous heritage studies of the area were also reviewed, notably *Keeping Brunswick's Heritage* (Context Pty Ltd, 1990), the *Moreland Heritage Review* (Allom Lovell & Assoc., 1999) and the *Moreland Local Heritage Places Review* (Context Pty Ltd, November 2004, Amended April 2008). The history of the site was researched using rate books and Sands and McDougall directories. Reference is also made to the Council Officer's response to submissions (Attachment 1 to the Agenda for Council Meeting 13 March 2019).

3.0 Author Qualifications

4. 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

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

A handwritten signature in black ink, appearing to read 'Bryce Raworth', with a period at the end.

BRYCE RAWORTH

5.0 History and Description

6. According to Context's citation, the house at 32 David Street was constructed c1870, with the first owner/occupant being Thomas Delahunty, a labourer and brickmaker. Delahunty is recorded as the occupant and owner of a two-room house on the site in the rate book for 1871/1872 (the preceding Brunswick rate books are not available, as noted in the Context citation). The house can be seen in a 1905 MMBW plan with a larger front setback relative to neighbouring houses.

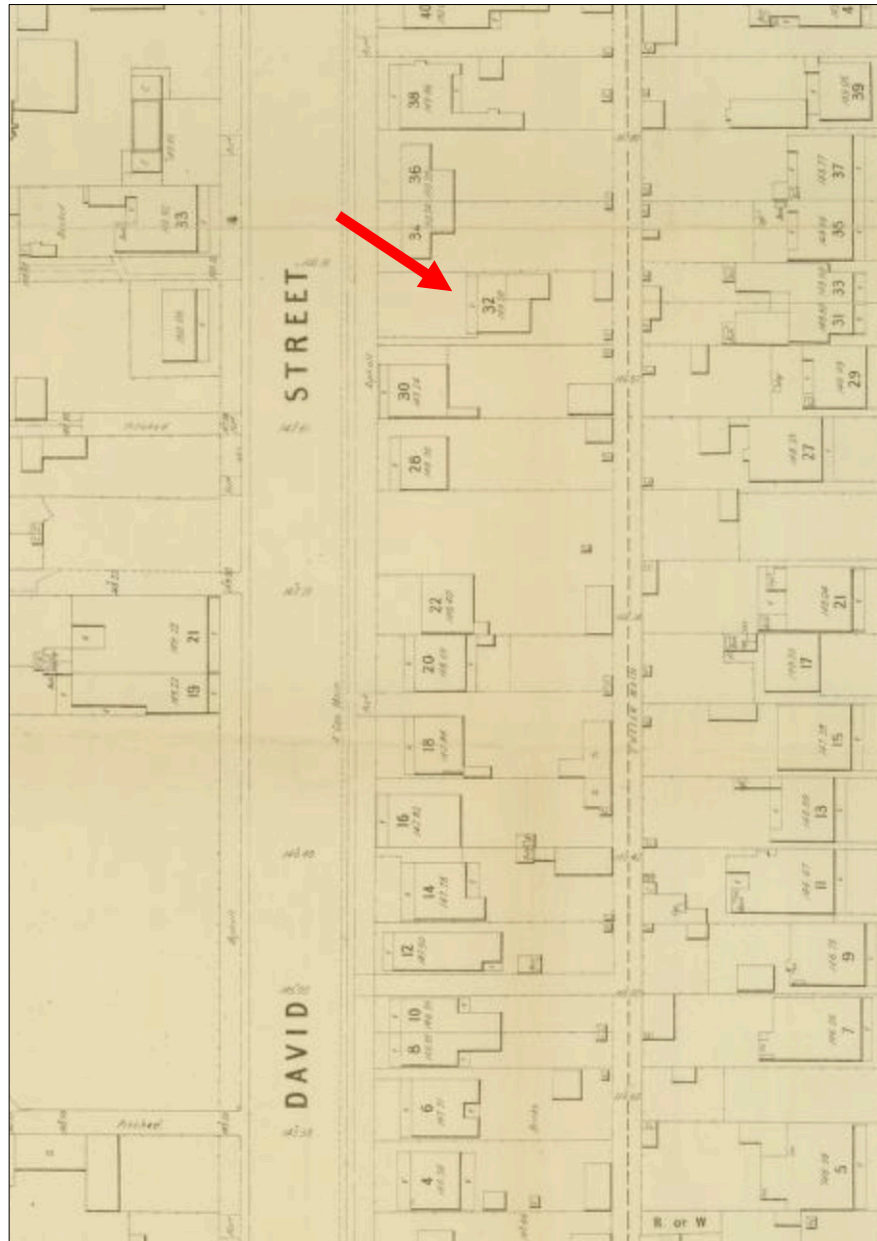


Figure 1 Extract from a 1905 MMBW plan of Brunswick with the location of 32 David Street marked by an arrow. Source: State Library of Victoria.

7. An analysis of Sands and McDougall directories indicates that the c1870 construction date given in the citation is generally accurate. ‘Thomas Delanty’ (presumably a misspelling of Delahunty) is first listed as a resident of David Street in the 1872 Sands and McDougall directory. Prior to 1872, the directories show Delanty living in Weston Street, Brunswick. David Street first appears in the directories in 1870, which is broadly consistent with information in the Context citation that the street was created as part of an 1868 subdivision.
8. The house adopts a fairly standard mid-to-late Victorian vernacular cottage form, comprising a transverse gabled roof and symmetrical double-fronted façade with a skillion front roofed verandah. External walls are face brick with basalt window sills. The uneven colouring of bricks with many overfired clinkers suggest that they were seconds rather than standard quality bricks.
9. In terms of its intactness, the house has a modern carport in the front setback and post-war skillion roofed additions to the rear. The façade has been sandblasted (destroying the face of the bricks) and crudely re-pointed with modern mortar in part smeared across the brickwork. The south elevation is rendered and there is evidence that the bricks to the front elevation were also rendered. Given the uneven quality and appearance of the bricks, it would be reasonable to assume the façade was originally rendered or painted or both. The front door, window frames and shutters are all non-original elements. The cast metal verandah frieze is a modern aluminium replica and the verandah floor (presumably originally of timber construction) has been replaced with concrete, with the posts mounted on modern metal stirrups. The verandah posts themselves may also be later replacements and the verandah detailing more generally seems incorrect for a Victorian era dwelling, with the posts above the capitals adapted to a wider dimension in order to ‘fit’ the cast aluminium decoration. The main roof and verandah roof appear to have been reclad and have been fitted with modern quad profile gutters. The chimney to the south side of the house is constructed using bricks that are seemingly more recent than those used in the c1870 front wall, and no chimneys survive to the front rooms of the house.



Figure 2 *The house viewed from David Street showing replica front fence and a carport in the front setback.*



Figure 3 The front elevation. Note how the posts above the capitals have been extended sideways in order to make the cast aluminium frieze fit – this seems to be a modern detail arising from the use of a modern frieze.



Figure 4 (left) Detail of the front façade showing non-original window frame and shutters.



Figure 5 (right) Detail of the front façade showing the modern period style front door.



Figure 6 (left) Detail of the front façade showing bricks of varying colour (many overfired clinkers) and modern cement rich pointing.

Figure 7 (right) The south elevation. This elevation has been part rendered. The chimney is constructed using red bricks that appear to date from the twentieth century.

6.0 Heritage Status

Moreland City Council

10. As noted, Amendment C174 to the Moreland Planning Scheme proposes to introduce a permanent site-specific Heritage Overlay to 32 David Street, Brunswick. No external paint controls, internal alteration controls or tree controls are proposed. An interim heritage overlay control (HO466) has been applied to the site and is due to expire 31 December this year.

11. 32 David Street was not identified as a significant building either the 1990 *Keeping Brunswick's Heritage* or the 1999 *Moreland Heritage Review* [accepting that the brief for the 1999 study was mainly limited to a survey of previously identified places]. The 2004/2008 *Moreland Local Places Heritage Review* identified 32 David Street as a place of potential significance with a 'high priority' for further investigation. Within the terms of that study, high priority places were considered to be *'good examples of their type when compared to other similar places in the municipality'*.

Heritage Victoria

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

National Trust of Australia (Victoria)

13. The subject site is not included on the Register of the National Trust of Australia.

7.0 Significance

14. I am aware of three versions of the statement of significance for 32 David Street as prepared by Context Ptd Ltd. The first statement of significance (assumed to be the earliest iteration) is entered on the Victorian Heritage Database. A second more detailed statement of significance was provided to my office in December last year, but this differs somewhat from the statement of significance forming part of the exhibited citations currently on Moreland's website. The exhibited version is reproduced below:

What is significant?

The house at 32 David Street, Brunswick, built c.1870 for (and probably by) Thomas Delahunty, a brickworker and labourer, is significant.

The timber front fence, the timber framed carport and post 1950 additions to the cottage are not significant.

How is it significant?

The house at 32 David Street, Brunswick, is of local historical and representative significance to the City of Moreland.

Why is it significant?

It is historically significant as one of the oldest surviving houses in Brunswick and provides tangible evidence of the early development of this part of Brunswick, which was part of merchant David Blair's 1868 subdivision that created David Street and neighbouring Blair, Eveline, Lydia and Laura streets. It was one of a series of early dwellings built in David Street prior to 1871 and is now one of only few to survive. It is also significant as a rare representative example of the brick cottages constructed for (and probably by) owners employed in the local brickmaking industry, using local bricks. The simple, unpretentious gabled form is characteristic of these early cottages. (Criteria A, B & D)

The house has significance for the potential to provide further information about the early bricks produced in Brunswick and the vernacular building techniques used by the original owner/builders. (Criterion C)

15. The statement of significance provided to my office in December last year is somewhat different in that it cites local historical and architectural significance, not representative significance, nor does it refer to Criterion C:

What is Significant?

The brick cottage at 32 David Street, Brunswick, built c.1870 is significant. The timber front fence, the timber framed carport and post 1950 additions to the cottage are not significant.

How is it significant?

The brick cottage at 32 David Street, Brunswick, is of local historical and architectural significance to the City of Moreland.

Why is it significant?

The brick cottage at 32 David Street, Brunswick, erected c.1870, is a rare surviving example of the brick cottages constructed from local hand made Brunswick brick in the early Victorian period. Built for (and probably by) brickmaker and labourer Thomas Delahunty, it is likely to have been built using bricks from one of the local brickworks. (Criterion A and B)

The Victorian brick cottage at 32 David Street, Brunswick, is architecturally significant as a rare example in Brunswick of the vernacular early to mid-Victorian workers cottage. (Criterion D)

16. The further statement of significance for 32 David Street as found on the Victorian Heritage Database is different again in that it only attributes local historical significance to the house, not representative, architectural or technological:

What is significant?

The house at 32 David Street, Brunswick.

How is it significant?

The house at 32 David Street, Brunswick is of local historic significance.

Why is it significant?

32 David Street is of historical significance as evidence of the early development of this part of Brunswick. It was one of two brick dwellings built in David Street prior to 1871, and is the only one to survive, demonstrating the principal characteristics of a cottage from this period. 32 David Street is one of several houses that survive substantially intact from first period of development in David Street in the 1870s, and that forms part of a partially intact early streetscape.

17. The provenance of the Victorian Heritage Database statement of significance is unclear. The database includes a note that the listing for 32 David Street was 'last updated 13 October 2004' but also cites two sources under the heading 'heritage study/consultant': the *Moreland Heritage Gaps Study 2017* and the *Moreland City Council: Local Heritage Places Review*, (Context Pty Ltd, 2004).
18. My analysis below specifically addresses the exhibited statement of significance/citation. This notwithstanding, it is apparent that the significance of the site has been re-evaluated with each iteration, with additional and differing criteria being advanced as relevant in the assessment against a threshold of local significance.

8.0 Analysis

19. In my view, the house at 32 David Street has only very limited significance to the City of Moreland in terms of its historical and architectural values. It does not meet the threshold of significance for an individual heritage overlay.
20. The building has been more heavily altered than described in the exhibited Context citation. The front door and window shutters are described as non-original elements in the citation, but as noted in section 5.0 of this statement, the front window joinery also appears to be non-original. Nor does the citation mention that the verandah floor has been replaced with a concrete paving, or that the verandah frieze is a modern aluminium replica. The front elevation has been heavily sandblasted, damaging the fired face of the bricks, and crudely re-pointed in cement-rich mortar. The original chimneys to the front portion of the house have been removed. It is also noted that much of the rear wing is a later addition, notwithstanding that this change has not

impacted on the remnant heritage character of the building as experienced from David Street.

21. The extent to which the exterior of 32 David Street has been altered and its attendant loss of original fabric is sufficient grounds for it to be withdrawn from the Amendment. It is noted that Council Officers have recommended that the interwar bungalow at 36 King Street, Fitzroy North be removed from the Amendment on the basis of a submission that demonstrated that the building was of lower integrity than was described in the citation. The submission for 36 King Street describes the following changes, noting that most of the works are similar to those which have occurred at 32 David Street: replacement of front and rear windows, substantial replacement of the front verandah flooring with concrete, replacement of the lower sections of the verandah posts, new entrance door and replacement of the original roof cladding.



Figure 8 The interwar bungalow at 36 King Street, Fitzroy North. The Council Officer's recommendation is to withdraw the place from Amendment C174.

22. Turning to other matters, it is noted in the 'Description' within the exhibited citation that the cottage is 'set well back from the street alignment, unlike the majority of other cottages in David Street'. The fact that the house has a relatively deep front setback is not remarkable within a local context and does not contribute to the significance of the place. As can be seen from the 1905 MMBW plan illustrated in part at Figure 1 above, houses in this part of Brunswick were built with varying setbacks, and some examples with larger setbacks can be seen to the rear on Eveline Street.
23. It is instructive to note that the previous assessment of the site, as listed on the Victorian Heritage Database, did not identify 32 David Street as a place of architectural/aesthetic significance (refer section 7.0 of this statement). Rather, 32 David Street was only identified as a place of *historical* significance on the basis that it provided evidence of the early development of 'this part' of Brunswick (with a particular emphasis on the house's rarity in the immediate context of David Street).

24. The exhibited statement of significance makes a similar assertion. The house does not gain any local historical significance by virtue of being one of the earliest surviving buildings in a comparatively small late-1860s subdivision encompassing only a few streets.
25. With reference to Criterion A, the association with David Blair's 1868 subdivision (creating David Street and a few neighbouring streets) is not important to the course or pattern of Moreland's cultural history.
26. To the extent that the exhibited citation identifies only *local historical and representative significance*, this presumably clarifies that the claim of architectural significance is no longer being made.
27. Further to issues of historical significance, the house at 32 David Street is not inherently important for having a brickmaker as its first occupant, insofar as many nineteenth century Brunswick residences would have been occupied by persons employed in brickmaking - this having been one of the suburb's main industries. The house might well have been built by its first occupant Thomas Delahunty, although I am not aware of any documentary evidence to substantiate this claim, nor would the fact that Delahunty worked as a brickmaker necessarily mean that had skill set to construct a brick house. It is entirely possible that Delahunty bought the house from a builder, as was relatively typical for the time.
28. The suggestion in the exhibited citation that *the house has significance for the potential to provide further information about the early bricks produced in Brunswick and the vernacular building techniques used by the original owner/builders* seems fanciful. There is no evidence of a vernacular building technique having been employed, as opposed to a conventional building technique. The bricks themselves have been damaged such that they do not retain their original fired brick face and in any case are seemingly conventional bricks, albeit of an unmatched seconds character.
29. The fact that seconds bricks have been used suggests that this was intended as an inexpensive building essentially comparable to the weatherboards around it, with the bricks to be painted or rendered. The suggestion in one of the statements of significance that the bricks were 'hand made' seems unlikely in the context of the nearby brickworks, and it is presumably on this basis that the statement no longer makes reference to hand made bricks, but rather to local bricks.
30. The Context citation conjectures that the house could be a much earlier building, predating the c1868 formation of David Street, on the basis that the 1905 MMBW shows no plumbing connections to the site. This demonstrates a flawed understanding of historic MMBW plans, which were drawn up to facilitate the design of the sewerage system. Furthermore, an analysis of primary historical sources (namely Sands & McDougall Directories) affirms c1870 as the construction date. David Street first appears in Sands and McDougall directories in 1870 with a single listing for Patrick McCormick. The next house to be built on David Street is recorded in the 1871 directory with John Ryan as the occupant.

31. An analysis of subsequent directory listings for David Street suggests that the houses occupied by McCormick and Ryan were located to the south of the present day 32 David Street. ‘Thomas Delanty’ [Delahunty] does not appear in the directory listings for David Street until 1872. He was previously listed under a Weston Street address – such that his occupancy of the David Street property could not conceivably have begun any earlier than c1871. That is to say, it is highly unlikely that the house at 32 David Street was built before 1870.
32. The claim that this is one of the earliest surviving houses in Brunswick ignores the example of pre-fabricated iron cottages at 181-189 Brunswick Road [listed on the Victorian Heritage Register as H1151], which were erected c1854, some 16 years prior to 32 David Street. Other notable early dwellings in the Brunswick area include Whitby House, 28 Whitby Street, Brunswick West (c1850) [VHD H546] and the cottage at 130 Barkly Street (late 1850s) [VHD H594]. Early dwellings surviving elsewhere in the City of Moreland include: Lyndhurst Hall, 46 Walhalla Street, Pascoe Vale South (a c1853 prefabricated house, relocated to its present site 1868 and renovated in 2011) [VHD H964], Gowrie, 63-65 Gowrie Street, Glenroy (1855) [VHD H128], Wentworth House, 22 Le Cateau Street, Pascoe Vale (commenced c1842 with c1850s additions) [VHD H138], 82 Bell Street, Coburg (1864) [VHR H689] and The Grange, 39 Belgrave Street, Coburg (c1854) [VHD H1297].



Figure 9 (left) 181-189 Brunswick Road, Brunswick. Prefabricated iron houses, constructed c1854 (VHD H1151).



Figure 10 (right) 130 Barkly Street, Brunswick. Constructed c late 1850s (VHD H594).



Figure 11 (left) Lyndhurst Hall, 46 Walhalla Street, Pascoe Vale South. A c1853 prefabricated house, relocated to its present site 1868 and renovated in 2011 (VHD H964).



Figure 12 (right) Whitby House, 28 Whitby Street, Brunswick West. Constructed c1850 (VHD H546).



Figure 13 (left) *Gowrie*, 63-65 Gowrie Street, Glenroy. Constructed 1855 (VHD H128).

Figure 14 (right) *Wentworth House*, 22 Le Cateau Street, Pascoe Vale. Commenced c1842 with c1850s additions (VHD H138).



Figure 15 (left) *Cottage*, 82 Bell Street, Coburg. Constructed 1864 (VHR H689).

Figure 16 (right) *The Grange*, 39 Belgrave Street, Coburg. Constructed c1854 (VHD H1297).

33. The fact that the dwellings referenced above are included on the Victorian Heritage Register does not make them invalid as comparators for 32 David Street. The point is that there are much earlier dwellings extant in Moreland than 32 David Street, be they of state or local significance. Nor can the examples of early dwellings in Moreland be ignored where they are found outside of the suburb of Brunswick. For the purpose of assessing whether a place meets the threshold of significance for a heritage overlay, 'local' should correlate to the municipality as a whole. In this context, a c1870 construction date is not so early as to justify an individual heritage listing for what is otherwise an altered and architecturally unprepossessing building with an unremarkable history.
34. In addition to the places on the Victorian Heritage Register referred to above, Moreland's heritage overlay schedule includes a good representative sample of early cottages [including some of masonry construction] predating Melbourne's 1880s land boom. The citation lists seven examples – the bluestone cottage at 130 Barkly Street (as described above, this site is on the Victorian Heritage Register), the c1860s bluestone cottage at 151 Barkly Street (H018), the bluestone cottages at 189-191 Edward Street (HO74), the c1865 semi-detached timber cottages at 247-249 Albert Street (HO3), c1860s attached timber cottages at 361-365 Albert Street (HO6), the c1866 former shop and brick dwelling at 145-147 Union Street (HO231), and the largely intact c1875 brick cottage at 373 Albert Street (HO7), built by the Hoffman Patent Brick & Tile Company for the manager of their adjacent brickworks.

35. The dwelling at 373 Albert Street was built only a few years after 32 David Street and is more intact and has a stronger and more significant association with the brickmaking industry in Brunswick. 130 Barkly Street is thought have been built by a local quarryman in the late 1850s and hence is a much earlier and more historically significant building than 32 David Street. The other buildings listed above are all dated to the 1860s and generally exhibit a higher degree of integrity, notwithstanding that some have reconstructed elements, such as verandahs. For the purposes of assessing heritage significance, integrity is defined as the degree to which the heritage values of the place are still evident and can be understood and appreciated. Intactness: refers to the degree to which a place or object retains its significant fabric.
36. The citation also makes reference to the c1870 brick cottages at 63-65 Union Street, Brunswick and the timber cottage at 38 David Street. These cottages are proposed for heritage overlay controls under Amendment C174, and as such are not useful as a benchmark for meeting the threshold of significance for an individual heritage overlay – it has not been established that they warrant the control themselves.
37. Nonetheless, the façade of 65 Union Street has face brick that appears to have been sandblasted, like 32 David Street. The door and window joinery and the render to the façade of 63 Union Street are likely to be relatively recent and the roof form appears to have been altered (resulting in a lower ridgeline than that of 65 Union Street).
38. It is not clear why the nearby timber dwelling at 59 Union Street is not mentioned by Context as an example of a Victorian vernacular cottage (including in relation to the citation for the very similar timber cottage at 38 David Street). It is possible that 59 Union Street was overlooked in past heritage studies because it was unrenovated and unsympathetically altered, with the current appearance being a result of renovation works occurring within the past few years. In any event, 59 Union Street is another example in Moreland of the early vernacular cottage form with a transverse gable roof, like that found at 32 David Street.



Figure 17 (left) 1860s bluestone cottage, 151 Barkly Street, Brunswick (HO18).



Figure 18 (right) 1860s bluestone cottages, 189-191 Edward Street (HO74).



Figure 19 (left) c1875 brick dwelling at 373 Albert Street, Brunswick (HO7).



Figure 20 (right) Three attached c1860s timber cottages, 361-365 Albert Street, Brunswick (HO6).



Figure 21 (left) c1865 timber cottage pair at 247-249 Albert Street (HO3).



Figure 22 (right) 63 Union Street, Brunswick. A heritage overlay control is proposed for this site as part of Amendment C174.



Figure 23 (left) 65 Union Street, Brunswick. A heritage overlay control is proposed for this site as part of Amendment C174.



Figure 24 (right) 59 Union Street, Brunswick. This site is not currently subject to a heritage overlay, nor is it recommended for heritage listing under Amendment C174.

39. Aside from the examples of early Brunswick dwellings mentioned in the citation there is the c1850s bluestone cottage at 179 Albion Street (an individually significant building in HO66), the 1860s bluestone cottage at 193 Weston Street (HO195) and an 1873 double storey bichrome brick house at 326 Amess Street, Brunswick East (HO11). The cottage at 193 Weston Street has a higher degree of integrity than 32 David Street, despite its front verandah also being a reconstruction. The cottage at 179 Albion Street has been converted into a café and has a modern door and a (presumably) non-original dormer window, but is otherwise of reasonably good integrity.

40. Additionally, there are single storey timber dwellings at 1 Wraith Street and 2 Charles Street, Brunswick. Both are undated but have transverse gable roofs and a simple vernacular cottage form suggestive of a c1860s-70s construction date. Outside of Brunswick there is a c1870s timber dwelling at 65 Bell Street, Coburg, which is consistent with the early to mid-Victorian vernacular cottage form of 32 David Street.



Figure 25 1860s bluestone cottage, 193 Weston Street, Brunswick (HO195).



Figure 26 (left) c1850s bluestone cottage, 179 Albion Street, Brunswick (an individually significant building in the De Carle/Bishop Street Precinct, HO66).



Figure 27 (right) Timber cottage, 1 Wraith Street, Brunswick (a contributory building in HO66).



Figure 28 (left) Timber cottage, 2 Charles Street, Brunswick (a contributory building in the Edward Street Precinct, HO73).

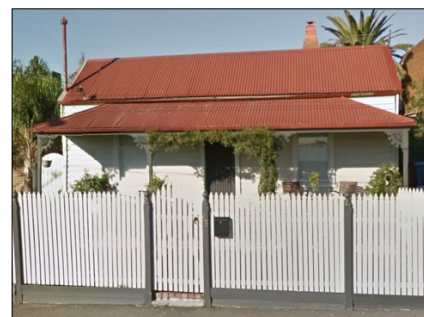


Figure 29 (right) c1870s timber cottage, 65 Bell Street, Coburg (HO269).

41. That comparatively few c1860-70s cottages (whether of brick, stone or timber construction) survive in Brunswick does not provide sufficient justification for listing an example that is inferior to those already on the heritage overlay. The comment in the citation that early brick cottages in Brunswick are ‘underrepresented’ on Moreland’s heritage overlay schedule improperly suggests that there should be a minimum quota of this building type on the schedule.
42. Rather than pointing to any particular deficiencies in Moreland’s existing heritage listings, the ‘underrepresentation’ of early brick cottages seems to be more a result of brick houses not having been built in large numbers in Brunswick during the 1860s and 1870s. For example, the citation describes how 32 David Street was one of only two brick houses in the street in 1871/72, out of a total of fourteen (the others being of timber construction).
43. Further to this issue of rarity, it is reasonable to question that manner in which the citation for 32 David Street establishes the case for rarity by categorising the house as a very specific variation of a Victorian dwelling – ie double-fronted, brick walled, cottage with a modest transverse gable form and a simple verandah. The Panel for Bayside Amendment C29 (part 2) found little justification for subdividing a general class of building to this degree. The house at 32 David Street is not locally significant simply by virtue of being a rare surviving example of a very specific building type. As stated in the Bayside C29 Panel report, rarity, in and of itself, is not a sufficient basis for heritage overlay listing:

The application guidelines for the Criteria for the Register of the National Estate not this criterion [B2 – rarity] relates to rare activities, not just the lack of example of a type due to historical attrition.

The Panel understands that in some cases a building may be a rare surviving example but unless such a building had heritage significance prior to becoming rare, rarity of itself will not necessarily translate to cultural heritage significance.

44. The Officer’s response to submissions discusses the issue of rarity with reference to Heritage Victoria’s *Criteria and Threshold guidelines for identifying places of state significance*, quoting the superseded 2012 version of that document. The guidelines were updated in 2018 and some changes were made to the text in relation to Criterion B (rarity). Nonetheless, as described and illustrated above, Moreland retains a relatively high number of early to mid-Victorian dwellings of state or local significance, such that buildings from this era cannot reasonably be considered to be under threat of disappearing entirely – noting again that rarity should be assessed in a municipal wide context rather than a discrete area of the municipality, or more particularly in terms of a handful of neighbouring streets. Heritage Victoria have ‘exclusion guidelines’ for criterion B, which are relevant to 32 David Street, inter alia:

Low or questionable importance of attribute linked to the place/object	The place/object is rare, or is even the only one of its type, but the attribute(s) of claimed rarity is of questionable importance . For example, the only 2-storey potting shed or bandstand with fitted windows etc.
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Dependence on too many qualifiers	The claimed rarity is dependent upon numerous qualifiers being strung together. For example, the place is the only stone house ...with a slate roof...in the Federation style...designed by the architect...
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45. Having further consideration for Heritage Victoria's *Criteria and Threshold guidelines for identifying places of state significance*, it is apparent at once that in the first instance a place should be assessed against a basic test for satisfying any given criterion, but then, having met that basic test, it should be assessed against a test for determining state level significance. In a local context, and in relation to the Heritage Overlay, the relevant second step would be a test for determining local level historical significance, ie, and paraphrasing the Heritage Victoria document, 'The place/object allows the clear association with the event, phase, etc, of historical importance to be UNDERSTOOD BETTER THAN MOST OTHER PLACES OR OBJECTS IN MORELAND WITH SUBSTANTIALLY THE SAME ASSOCIATION (caps as per the Heritage Victoria document).
46. Similarly, in terms of technological significance at Criterion C and representative significance at Criterion D, the second test would be as follows:

Criterion C

- The knowledge that might be obtained through investigation is likely to MEANINGFULLY CONTRIBUTE to an understanding of Moreland's cultural history.
- The information likely to be yielded from the place/object is NOT already WELL DOCUMENTED or READILY AVAILABLE from other sources.

Criterion D

- The place/object is a NOTABLE EXAMPLE of the class in Moreland (refer to Reference Tool D).

Reference Tool D: What is a 'notable example' of a class?

- **A fine example** – the place/object displays a large number or range of characteristics that is typical of the class; the place/object displays characteristics that are of a higher quality or historical relevance than are typical of places/objects in the class; or the place/object displays the principal characteristics of the class in a way that allows the class to be easily understood/appreciated
 - **A highly intact example** – the place/object displays characteristics of the class that remain mostly unchanged from the historically important period of development or use of the place/object.
 - **An influential example** – the place/object contains physical characteristics of design, technology or materials that were copied in subsequent places/objects of the class (direct physical influence), or other places/objects were created, altered or used in response to the characteristics of this place/object.
 - **A pivotal example** - the place/object encapsulates a key evolutionary stage in the development of the class.
47. In my view there is simply no case to be made that the subject site meets these Step Two threshold considerations in terms of either historical interest, technological or representative interest. This is further demonstrated in my assessment against the

Criteria as follows (noting again that Context's assessment is that the site meets criterion A, B, C and D):

Criterion	Comment
<i>CRITERION A: Importance to the course or pattern of the City of Moreland's cultural or natural history (historical significance).</i>	This criterion is not met. The fact that the house is one of the earliest surviving buildings in what was a relatively small subdivision in Brunswick does not demonstrate importance to the course of Moreland's history. Nor can the house be counted among the earliest surviving dwellings in Moreland, let alone the much smaller area encompassed by the suburb of Brunswick.
<i>CRITERION B: Possession of uncommon, rare or endangered aspects of the City of Moreland's cultural or natural history (rarity).</i>	This criterion is not met. As described, the case for rarity is dependent on too many qualifiers. More generally, it is apparent that Moreland retains a good representative sample of pre 1870s dwellings, with some of much earlier construction date and/or higher integrity (of either state or local significance).
<i>CRITERION C: Potential to yield information that will contribute to an understanding of the City of Moreland's cultural or natural history (research potential).</i>	This criterion is not met. There is no evidence of a vernacular building technique having been employed, as opposed to a conventional (and already well documented and understood) building technique. It is not clear what information could be yielded from the brick seconds used at 32 David Street beyond that which is already well documented and readily available in relation to early brickmaking in Melbourne (eg Miles Lewis' online database: <i>Australian Building: A Cultural Investigation</i>)
<i>CRITERION D: Importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness).</i>	This criterion is not met. The house is not a good representative example of its type on account of the unsympathetic alterations and loss of original fabric.
<i>CRITERION E: Importance in exhibiting particular aesthetic characteristics (aesthetic significance).</i>	It is agreed that this criterion is not applicable.
<i>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).</i>	It is agreed that this criterion is not applicable.

<i>CRITERION H: Special association with the life or works of a person, or group of persons, of importance in the City of Moreland's history (associative significance).</i>	It is agreed that this criterion is not applicable.
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48. To be identified as a place of local significance sufficient to warrant application of the Heritage Overlay, a place should meet one or more of the above criteria to a degree that meets a threshold of local significance. This is to say, the criteria in question should be met not just in a simple or generic manner, but to a degree that is better than many or most other examples at a local level, or to a degree that is comparable to other examples that are subject to the Heritage Overlay. This is not the case for the house at 32 David Street.

9.0 Conclusion

49. Having regard for all the above, it is my view that the house at 32 David Street, Brunswick is neither of sufficient integrity and intactness nor sufficient historical and representative significance to warrant an individual Heritage Overlay control as proposed under Amendment C174 to the Moreland Planning Scheme.

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BRYCE RAWORTH
M. ARCH., B. A. (HONS), ICCROM (ARCH)

Bryce Raworth has worked with issues relating to heritage and conservation since the mid-1980s, and has specialised in this area since establishing his own consultant practice in 1991. **Bryce Raworth Pty Ltd, Conservation • Heritage**, provides a range of heritage services, including the assessment of the significance of particular sites, preparation of conservation analyses and management plans, design and/or restoration advice for interventions into significant buildings, and detailed advice regarding the resolution of technical problems relating to deteriorating or damaged building fabric.

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

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

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

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

BRYCE RAWORTH

Professional Status:	Conservation Consultant and Architectural Historian
Current Positions:	Conservation consultant to the cities of Kingston, Frankston and Stonnington
Organisation Membership:	Australian Institute of Architects
Professional Experience:	<p>independent practice as conservation consultant and architectural historian from January 1991 (ongoing). Services include: identification and assessment of the significance of sites and complexes; preparation of guidelines regarding the safeguarding of significant sites; provision of technical, design and planning advice to architects, owners and government on issues relating to the conservation of sites of cultural significance; expert witness advice on conservation issues before the VCAT</p> <p>member, Historic Buildings Council (architectural historian's chair) 1993-1996; member, Heritage Council (architect's chair) 1998-2002</p> <p>conservation consultant to the cities of Brighton, Northcote and Sandringham (1989 only), Essendon, Hawthorn and Kew (1989-1994), Melbourne (1992-2009) and Prahran (1992-1994)</p> <p>established the Metropolitan Heritage Advisory Service on behalf of the Ministry for Planning & Environment - this service was offered to the cities of Brighton, Essendon, Hawthorn, Kew, Northcote and Sandringham in 1989-90</p>
Studies:	<p>Certificate of Architectural Conservation, ICCROM (International Centre for the Study of the Preservation and the Restoration of Cultural Property at Rome), 1994</p> <p>Master of Architecture by thesis, University of Melbourne, 1993 (thesis: <i>A Question of Style: Domestic Architecture in Melbourne, 1919-1942</i>)</p> <p>B. Architecture (First Class Honours), University of Melbourne, 1986</p> <p>B. Arts (Second Class Honours, Division A), University of Melbourne, 1986</p>
Committee Membership:	<p>Twentieth Century Buildings Committee, National Trust of Australia (Victoria), 1990-1994 (Chairman 1992-1993)</p> <p>RAIA Jury, Conservation Category, 1995, 1996, 1998 and 2001 Awards (Chairman 1996 & 1998)</p>
Awarded:	<p>Henry and Rachel Ackman Travelling Scholarship in Architecture, 1987-88</p> <p>JG Knight Award, conservation of Heide 1, Royal Australian Institute of Architects, Victorian Chapter, 2003</p> <p>Lachlan Macquarie Award for heritage (commendation), conservation of Heide 1, Royal Australian Institute of Architects National Award program, 2003</p> <p>Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, Victorian Chapter, 2015</p> <p>Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, National Awards, 2015</p>