

Expert Witness Statement to Panel

Amendment C161port Part 2
Port Phillip Planning Scheme

335 Ferrars Street, South Melbourne

Prepared under instruction from JRT Partnership
January 2021

Contents

1.0	Introduction	2
2.0	Sources of Information.....	3
3.0	Author Qualifications.....	3
4.0	Declaration.....	4
5.0	Description and Brief History	5
6.0	Heritage Status	16
7.0	Discussion.....	21
8.0	Conclusion	24

Attachment 1 Bryce Raworth CV

Attachment 2 Letter from Bryce Raworth Conservation to Council, dated 26 August 2020

1.0 Introduction

1. This statement of evidence was prepared under instruction from JRT Partnership on behalf of the owner of the site at 335 Ferrars Street, South Melbourne. I have been instructed to comment on the heritage considerations associated with Amendment C161port Part 2 to the Port Phillip Planning Scheme, in relation to the property at 335 Ferrars Street, South Melbourne.
2. By way of background, Amendment C161port Part 2 to the Port Phillip Planning Scheme proposes to make a series of updates and technical corrections, including zoning and overlay mapping changes and changes to the heritage gradings of properties. The Amendment also seeks to implement the findings of a number of heritage studies commissioned by Council.
3. Correspondence from Council to the property owner, dated 11 June 2020, stated that in relation to the subject site, Amendment C161port Part 2 proposed to do the following:
 - *Citation 2311 (included in the Port Phillip Heritage Review Incorporated Document) is proposed to be updated. A full review of the citation was undertaken, and changes are proposed that update the citation map accurately to reflect the location of the three bluestone bridges, and refer to the correct Heritage Overlay number.*
 - *The Heritage Policy Map Incorporated Document will be amended to change the grading from 'Non-Contributory' to 'Significant Heritage Place'. These changes affect land at:*
 - *322A Park Street, South Melbourne*
 - *30A, 31A, 204-333 Ferrars Place, South Melbourne*
 - *335, 341, 343, 345, 347, 349, 351 Ferrars Street, South Melbourne.*
4. I have been asked to comment on the merit of the proposal to amend the status of the subject site at 335 Ferrars Street, South Melbourne from 'non-contributory' to 'significant' within the Railway cutting and bridges heritage place (Citation 2311), further noting that this heritage place is presently located within the broader St Vincents Place East Heritage Precinct, identified as HO441 in the Schedule to the Port Phillip Planning Scheme. The subject site is mapped within the curtilage of the Railway cutting and road bridges heritage place as it is located within land that formed part of the original railway reserve.
5. As part of Amendment C161port Part 2, a blanket regrade of the land associated with the Railway cutting and bridges heritage place is proposed, primarily by means of an amendment to the Heritage Policy Map Incorporated Document. This is a change that has the effect of automatically elevating the significance of the subject site (and various neighbouring properties) from 'non-contributory' to 'significant'. The Railway cutting and bridges heritage place citation, as exhibited, comprises addresses 221-351 Ferrars Street and 332A Park Street, South Melbourne, and some components of these addresses contain buildings that are of little to no heritage significance. The Amendment mapping does not clearly differentiate the differing parcels of land within the precinct associated with these buildings.

6. Bryce Raworth Pty Ltd was retained to review the Amendment and provide advice on the subject site, and subsequently prepared a letter dated 26 August 2020 (Attachment 1) that was considered by Council in its subsequent report on the Amendment.
7. This statement was prepared with assistance from Sally Beaton of my office. The views expressed are my own.
8. I note that there is no private or business relationship between myself and the party(s) for whom this report is prepared other than that associated with the preparation of this statement and associated other reports and advice on heritage issues.

2.0 Sources of Information

9. The analysis below draws upon an external inspection of the site and a review of the exhibited Amendment C161port Part 2 documentation, which included a revised citation for the Railway cutting and bridges heritage place, written by David Helms as part of the *Port Phillip Heritage Review* (February 2019).
10. A review of the relevant planning scheme provisions, along with applicable heritage studies including the *Port Phillip Heritage Review 2020*, an incorporated document, the *City of Port Phillip Heritage Policy Map January 2020* was also undertaken. The analysis below also draws upon a review of Clause 43.01, the Heritage Overlay provisions in the Port Phillip Planning Scheme, and Council's local heritage policy, Clause 22.04.
11. Other sources used to inform this statement include:
 - *Sands and McDougall directories*
 - *Trove (source sited)*
 - *State Library Victoria*
 - *Landata*.

3.0 Author Qualifications

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

4.0 Declaration

13. 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 Description and Brief History

14. The subject property at 335 Ferrars Street is a thin rectangular shaped allotment with a frontage to Ferrars Street to the west, and with off-site parking adjacent to the north and the railway cutting to the east. The built form on the site is a highly modified early 20th century brick building, with part of the building finished with a brick and rendered parapet. A modern glass and steel addition has also been constructed to the north, and a first floor has also been added. The site is located in a mixed street context containing a high proportion of buildings from different periods, with a number of visually dominant recent buildings on the east side of Ferrars Street.
15. Upon inspection, a number of significant alterations have occurred to the building. These include but are not limited to the following:
- *the building underwent a substantial extension to the north in the period between 1931 and 1945;*
 - *a glass, steel and render 'entry' extension has been made to the north in recent years;*
 - *windows facing Ferrars Street have all been altered with the introduction of a metal 'shroud' detail and with modern fixed single pane glazing;*
 - *some sections of the facade to Ferrars Street have been altered (ie partially bricked up, or windows introduced, etc), and the facade shows signs of partial repointing that may indicate areas of change; in fact, it is likely areas of the façade have been rebuilt, with expansion joints introduced at that time'*
 - *the cornice details to the parapet of the northern portion of the elevation to Ferrars Street appear to be of modern, sectional construction (ie attached) rather than traditional construction;*
 - *the profile and detailing of the roof have been altered to the extent it presents as a 'modern' roof type, with an attic appearance to Ferrars Street and full two storeys to the east, railway elevation;*
 - *to the east, railway elevation, a modern upper level addition, with substantial glazing and modern, non-hipped roof form, is visually dominant.*
16. In short, while the building retains some brickwork dating from the turn of the century and later, it is no longer recognisable in terms of any original or early appearance.
17. Adjacent to the entrance along Ferrars Street is a plaque which reads 'South Melbourne Cycling Club Founded 1881'. While the plaque seemingly identifies the building as having historic associations with the South Melbourne Cycling Club for well over a century, as will be detailed, historical sources show that the South Melbourne Cycling Club leased various club rooms in the late 19th and early 20th century. The club utilised a building on the southern portion of the subject land c.1910 and continued to use the property until the late 1930s. The building was then substantially extended and redeveloped from c.1940 onward as a factory, and today bears no resemblance to its cycling club appearance, other than in remnant (altered) brickwork and the retention of a plaque that presumably followed the cycling club from site to site until finding its present home c.1910.
18. In May 1899, the *Record*, (a local newspaper at the time) stated that although the Cycling Club had very convenient club rooms in Clarendon Street, the membership roll was increasing, and larger premises were sought.¹ The article stated the club had decided to take over a large hall in Cecil Street which was

¹ *The Record*, Saturday 27 May 1899, Page 2.

previously used as the Mechanic's Institute, however, by July 1899, it was reported that the Cycling Club was unable to arrange for the lease of the old Mechanics Institute and were instead moving to larger premises on Ferrars Street, opposite the South Melbourne Railway Station.² This suggests the proposed premises were to be well north of the subject site, and on the west side of Ferrars Street.

19. In July 1902, the *Record* reported that the lease of the club rooms was due to expire and that the committee has secured a five year lease of the Masonic Hall, at the corner of Ferrars and Dorcas Street, South Melbourne.³
20. *Sands and McDougall* directories in 1905 and 1910 list the South Melbourne Cycling Club as being at 254 Ferrars Street, South Melbourne, to the corner of Dorcas Street. The street numbering does not appear to have changed in the past century, with 254-256 Ferrars Street still addressing the corner of Ferrars and Dorcas Street. That building is now registered as the Former Freemasons Hall (H0538), and has signage indicating use by the Melbourne Camera Club.
21. It is further noted that the *Sands and McDougall* directories from 1905 and 1910 do not list any buildings on the east side of Ferrars Street, south of City Road, suggesting the land adjacent to the railway line was not developed in any substantial way by this point. This being said, the 1895 MMBW detail plan for the area (see figure 1) depicts a small building in the vicinity of the subject site, with a yard and outbuildings to its north, indicating that some structures were present on the east side of Ferrars Street in the late 19th and early 20th centuries.

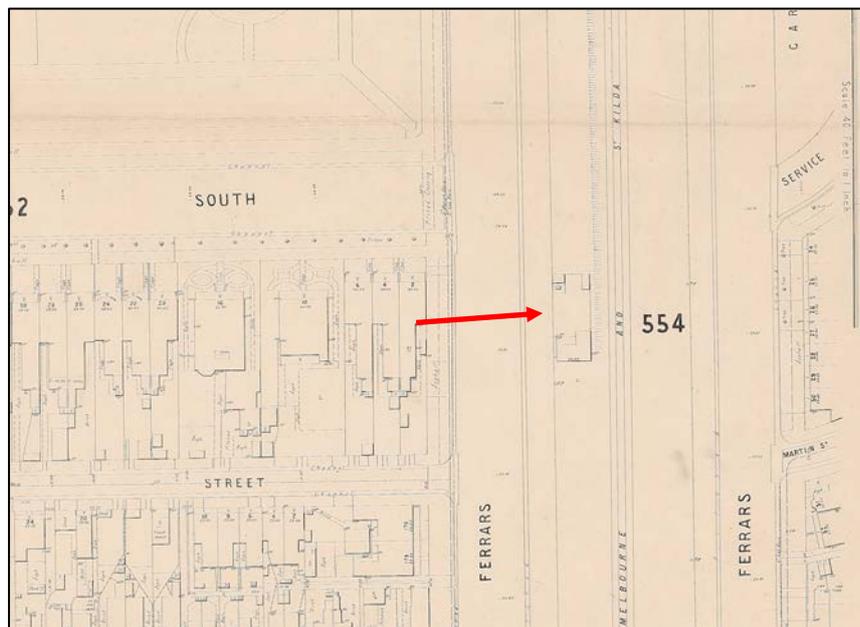


Figure 1 1895 MMBW Detail plan for Ferrars Street. The plan depicts a small building in the vicinity of the subject site, with a yard and outbuilding to its north. This small building may possibly comprise part of the southern portion of the subject building, although it may also have been replaced. Source: SLV

² *The Record*, Saturday 15 July 1899, Page 3.

³ *The Record*, Saturday 12 July 1902, Page 2.

22. In September 1910, *The Age* reported that the South Melbourne Cycling Club was seeking a permit to build brick club rooms on a portion of railway land running parallel with Ferrars Street, nearly opposite Bevan Street.⁴ As indicated figure 1 above, while it was reported that the club was seeking a permit to construct new club rooms, it is possible the club may have decided to occupy and/or alter the structures depicted in the 1895 MMBW plan, rather than construct an entirely new building.
23. By 1915 the club is listed in *Sands and McDougall* as being on the east side of Ferrars Street, between Park Street and Bridport Street (i.e. the subject site).

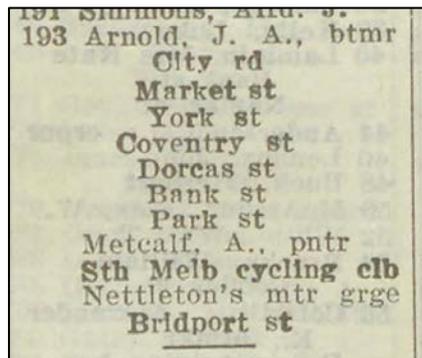


Figure 2 1915 *Sands and McDougall* entry for Ferrars Street. This indicates little development had occurred along the east side of Ferrars Street by this time.

24. In November 1919, *The Record* reported that plans for an addition to the club rooms had been submitted⁵, and the 1920, 1930 and 1935 *Sands and McDougall* directories continue to list the club rooms as being on the east side of Ferrars Street between Park and Bridport Street (though by 1930 this location is considered to be in Albert Park, rather than South Melbourne).
25. By 1940, the cycling club is no longer listed on Ferrars Street, with the building appearing to have become a factory by this time.

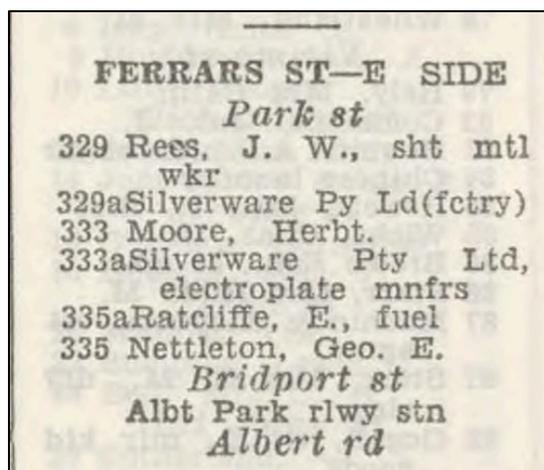


Figure 3 1940 *Sands and McDougall* entry for Ferrars Street.

⁴ *The Age*, Friday 30 September 1910, Page 5.

⁵ *The Record*, Saturday 8 November 1919, Page 2.



Figure 4 1931 aerial with the location of the subject site indicated by the arrow – there are shadows near the subject site, indicating there are buildings in this location. Source: Landata.

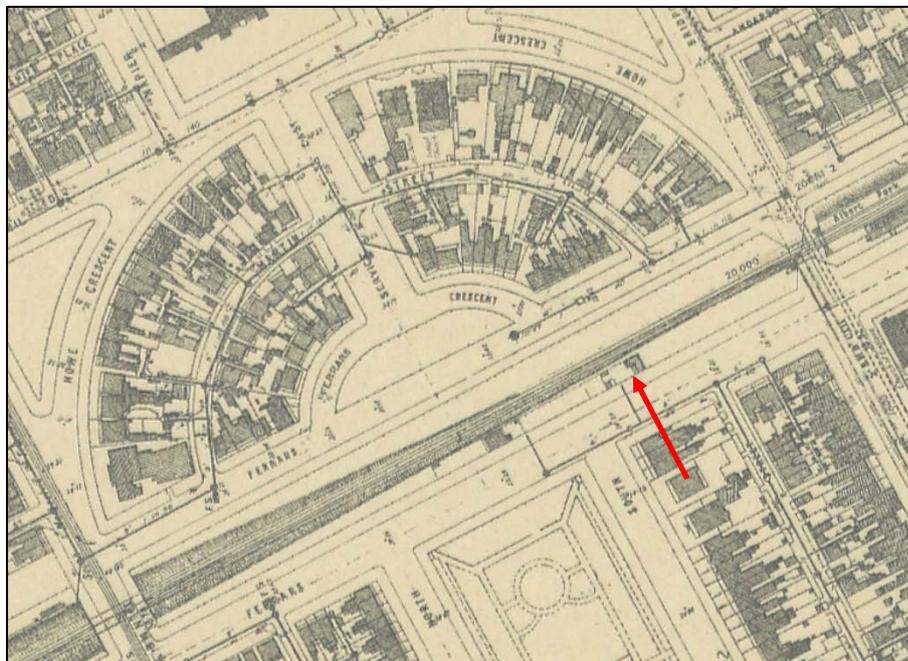


Figure 5 MMBW detail plan c.1933. This plan depicts the same small buildings in the vicinity of the subject site as those depicted in the 1895 MMBW in Figure 1 above. Sands and McDougall Directories list the South Melbourne Cycling club room in this location in the early 1930s. Source: State Library of Victoria.

26. A 1945 aerial clearly depicts buildings in the location of the subject site, at a time when the area had been largely redeveloped for industrial purposes, as per the uses listed in Figure 3 above.



Figure 6 1945 aerial, with the subject site highlighted by an arrow. Note the older, slate roof to the south, and the paler roofing of the northern extension (presumably iron).
Source: Landata

27. Sands and McDougall directories from 1940 through to 1974 (when Sands and McDougall ceased publishing) continued to record commercial and industrial buildings along this section of Ferrars Street.



Figure 7 1972 aerial, with the subject site highlighted by an arrow. Source: Landata.

28. At present, the subject site is a kitchen and bathroom showroom, with parking to its north. As highlighted above, the east side of Ferrars Street, between Park and Bridport Street is a mixed street context containing a high proportion of buildings from different periods, with a number of visually dominant recent buildings.



Figure 8 2006 aerial, with the subject site having undergone further changes, including to its roof form.



Figure 9 2018 aerial. The glass addition has been constructed to the north of the main brick envelope by this point.



Figure 10 *The Ferrars Street elevation of the subject building. The metal window shrouds and glazed windows are non-original. The two cornices that span the parapet of part of this elevation are of a modern segmented construction, suggesting they date from the same period as the window shrouds, ie they are not of traditional construction. The roof has been extended to form a first floor. The brick facade has been subject to extensive change.*



Figure 11 *Adjacent to the Ferrars Street entry (of which the door/glazing is modern), is a sign that reads 'South Melbourne Cycling Club Founded 1881'.*



Figure 12 The modern glazed addition to the north side of the brick envelope.



Figure 13 The southern brick extension (without parapet detailing) with the roof addition partially visible. Note the areas of brick that have been reworked, with expansion joints introduced to the brick face that separate different generations of pointing to brickwork.



Figure 14 The rear, eastern elevation, facing onto the railway reserve. From the railway side, an upper level is readily apparent as part of the altered roof form.



Figure 15 The rear elevation, facing onto the railway reserve, with the upper level a dominant element within the elevation.



Figure 16 North of the subject site is a open carpark, with a four storey modern apartment complex located at 333 Ferrars.



Figure 17 View south from the subject site. The opposite west side of Ferrars Street contains residential buildings, seperated from the eastern side by two lanes of traffic in each direction, parallel parking accomodation and a grassed medium strip.



Figure 18 North west of the property, on the west side of Ferrars Street is St Vincents Gardens.



Figure 19 View from the north west with the subject site to the right of image.

6.0 Heritage Status

29. The subject site is not included on the Victorian Heritage Register, nor is it classified as a place of local significance by the National Trust of Australia (Victoria).
30. At present the subject site is located within the St Vincent's Place East Heritage Precinct, identified as HO441 in the Schedule to the Port Phillip Planning Scheme. The Statement of Significance for the St Vincent's Place East Heritage Precinct is reproduced below.

What is Significant?

The St Vincent Place East Precinct in South Melbourne comprises two contemporaneous residential developments of contrasting layout: one with three curved roadways (Howe Crescent, Martin Street and Ferrars Place) radiating from a half-round reserve, and another alongside with a more conventional rectilinear grid layout (Anderson Street, and parts of Albert Road, Cecil Street and Bridport Street). Both areas developed promptly from the mid-1860s to the early 1870s, and today remain largely characterised by housing from that era, principally in the form of large residences (townhouses, terraces and large villas) and some smaller dwellings.

How is It Significant?

The precinct is of historical, architectural and aesthetic significance to the City of Port Phillip.

Why is It Significant?

Historically, the precinct is significant as a cohesive and self-contained development of housing from the late 1860s and early 1870s. It demonstrates the initial residential expansion beyond the original Emerald Hill township, which, over the next few decades, would spread further south and east. The precinct is also historically significant as South Melbourne's first prestigious residential estate, where many prominent Melbourne men (such as surgeon Dr James Barrett, and Collins Street retailers Samuel Mullen and W H Rocke) erected fine dwellings for themselves. The grand residences along Howe Crescent and Ferrars Place represent an interesting contrast to the smaller and humbler cottages that can be found in the alley-like Martin Street.

Historically, the northern portion of the precinct is significant as part of the broader St Vincent Place estate, which represents the finest example in Victoria of a nineteenth-century residential square on the English model. Although long separated from the larger part of the original estate (which is included on the Victorian Heritage Register) by the railway line, the present precinct represents the completion of the original crescent scheme. As such, it is also significant for associations with both its original surveyor Andrew Clarke, and with Clemet Hodgkinson, who subsequently revised the layout.

Aesthetically, the northern portion of the precinct is significant for its highly distinctive urban planning, namely the curving crescents, the notably wide central avenue (James Service Place), the associated reserves and avenues of mature street trees. This is enhanced by the built form itself, with rows of terraced houses and villas that follow the curve to create a truly unique streetscape, and elements such as the soldier's memorial hall, which serves as a focal point at the vista of the central avenue.

Architecturally, the entire precinct is significant for the consistent quality of its nineteenth century built form, with many fine and typically large residences that represent several types (eg detached townhouses, large villas, terraced dwellings in rows or as individual specimens) as well as smaller and more modest dwellings and cottages. Collectively and individually, these houses are of architectural significance as fine examples of late Georgian residential architecture, characterised by simple form and an understated Classical influence, complemented by some more ornate manifestations of the Boom-style of the late 1880s.

32. As well as being within a Heritage Overlay precinct, the property is also identified as being included within the 'Railway cutting and road bridges' heritage place, 221-351 Ferrars Street, South Melbourne, identified in citation 2311 of the *Port Phillip Heritage Review*, with the statement of significance reproduced below:

What is Significant?

The railway cutting extends for about 800 metres between the former South Melbourne and Albert Park railway stations. Originally excavated in 1856-57 as part of the St Kilda branch line of the Melbourne & Hobson's Bay Railway Company, this landscaped cutting includes three bluestone bridges at Dorcas, Park and Bank streets.

How is it Significant?

The railway cutting and bridges are of aesthetic and historic significance to the City of Port Phillip.

Why is it Significant?

Aesthetically, the railway cutting is of significance as an important vista between the railway stations at South Melbourne and Albert Park. Extending in a straight line for almost a kilometre, this notably long view can be appreciated from several vantage points including the road bridges at Dorcas, Bank and Park streets, the footbridge at Coventry Street, and the level crossing at Bridport Street. The bridges themselves are important visual elements, punctuating the vista, while the grassed embankments and mature trees also contribute to its aesthetic qualities. It contrasts with many other early railway cuttings (eg that in Alma Park) which tend to be curved.

Historically, the railway cutting and road bridges are of significance for their associations with the initial development of Melbourne's railway network in the 1850s. Although much of the actual railway infrastructure was removed following the line's conversion to a light rail, the cutting itself remains as one of the oldest and longest in the inner city area, while the three bluestone bridges are also rare and significantly early surviving examples of their type.



Figure 22 Currently the property is mapped within the curtilage illustrated in citation 2311, the 'Railway cutting and road bridges' heritage place, and is part of HO441.

33. As mentioned in the introduction, a letter sent from Council to the property owner, dated 11 June 2020, advised the following changes in relation to the status of these places:

- *Citation 2311 (included in the Port Phillip Heritage Review Incorporated Document) is proposed to be updated. A full review of the citation was undertaken, and changes are proposed that update the citation map accurately to reflect the location of the three bluestone bridges, and refer to the correct Heritage Overlay number.*
- *The Heritage Policy Map Incorporated Document will be amended to change the grading from 'Non-Contributory' to 'Significant Heritage Place'. These changes affect land at:*
 - 322A Park Street, South Melbourne
 - 30A, 31A, 204-333 Ferrars Place, South Melbourne
 - 335, 341, 343, 345, 347, 349, 351 Ferrars Street, South Melbourne.

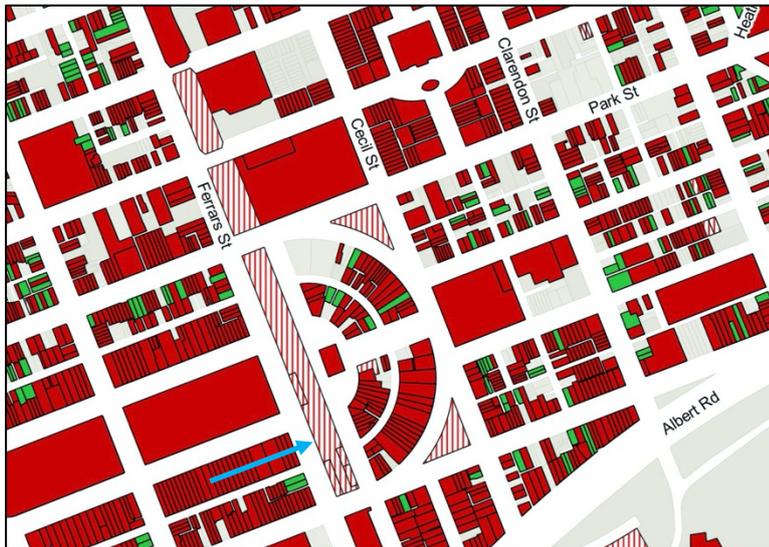


Figure 23 Proposed heritage policy map updated with the subject site to be remapped as significant.

34. It should be noted, however, that the exhibited version of citation 2311 appears to have had no changes to the associated map to identify the location of the three bluestone bridges. It has also not been accurately updated to reflect the correct Heritage Overlay number – the exhibited citation states the railway cutting and bridges are to be retained in HO440, however the area of land mapped in the citation extends across two Heritage Overlay areas, HO440 and HO441. The section of land between Park and Bridport Street (i.e. near the subject site) is located within HO441 (St Vincent Place East), whereas the portion further north between Park and Dorcas Street is located within HO440, (Emerald Hill Residential Precinct).

7.0 Discussion

36. As stated in the introduction I have been asked to comment on the merit of the proposal to change the status of the subject site at 335 Ferrars Street, South Melbourne from 'non-contributory' to 'significant' as part of the Railway cutting and bridges heritage place. This change arises as a result of the blanket regrading of the land associated with the Railway cutting and bridges heritage place, which is located within the broader St Vincent's Place East Heritage Overlay curtilage.
37. Having reviewed the documentation associated with Amendment C161 Part 2 and inspected the building, it is my view that while the text of the citation remains generally thorough and robust in relation to the core subject matter of the railway cutting and bridges, the regrading of the subject site at 335 Ferrars Street, South Melbourne from non-contributory to significant is not warranted. Furthermore, the methodology of regrading the subject site at 335 Ferrars Street (and other relevant buildings) from non-contributory to significant appears too general and requires attenuation within the citation and within the Heritage Policy Map Incorporated Document. This is of particular importance to the buildings that are of little to no significance, including the subject site.
38. The continued inclusion of the building within the broader Heritage Overlay HO441 is accepted. However, the inclusion of the subject site within the Railway cutting and bridges heritage place, and with the map included within the citation, can be questioned. While the site is within land that is understood to have originally formed part of the railway reserve, the building as found today has no recognisable link with the railway land use. It could very reasonably be left out of the land/curtilage associated with the Railway cutting and bridges heritage place, as could other buildings that have no associated contributory value, such as the modern apartment development to the north.
39. There is no obvious sign of the building's historic role or purpose other than the small sign on the exterior associated with the South Melbourne Cycle Club. While this sign seemingly dates to 1881, it is apparent that the central, oldest part of the building itself does not date from that period. As described in the history, the building is likely to have been constructed c.1910, with the South Melbourne Cycling club having occupied club rooms elsewhere in South Melbourne before occupying the subject site.
40. The sole reference to the building in Citation 2311 (both the current version and the exhibited version) is within the context of a description of the building in the broader heritage place:
- The premises of the South Melbourne Cycle Club at 335-337 Ferrars Street is a red brick building, apparently of Edwardian or inter-war vintage, which is enlivened by rendered stringcourses, scotia cornices and flat- arched windows with steel-framed casement sashes.*
41. In the first instance, it should be noted that this description, taken from the citation prepared as part of C52 and included within the present Heritage Review, appears to predate the most recent renovation of the place. It is clear that the 'steel-framed casement sashes' no longer exist, and have been replaced by the modern, fixed glazing with black metal shrouds. Accepting this, it is by no means certain that the 'rendered stringcourses, [and] scotia cornices' referred to in the description are those presently seen on site. A question mark can also be put against the description 'apparently of Edwardian or inter-war vintage'.

42. The unqualified identification of the South Melbourne Cycle Club plaque with the place is also potentially misleading, insofar as the plaque predates the subject building and its additions by decades. The building has also been heavily modified since it ceased to be associated with the South Melbourne Cycle Club.
43. There is little intrinsic link between the building's use as club rooms for several decades and the identified significance of the Railway cutting and bridges heritage place. No such link is even suggested in the citation, and the building is not mentioned in the statement of significance.
44. The extent of change that the building has undergone warrants emphasis. Looking to the Ferrars Street elevation, for example, the two cornice elements that embellish part of this elevation are of modern construction, being of segmented, attached character, rather than having a traditional construction on site that is integrated with the brickwork. No steel framed casement sashes are evident, with all glazing being fixed, single sash glazing associated with the modern shrouds. The brickwork is highly disturbed, with varying generations of pointing evident that suggest areas of change to the Ferrars Street elevation. Some sections have also had expansion joints introduced, a measure that is also suggestive of substantial change and/or rebuilding, as expansion joints would not be required in an old wall that was not undergoing major works.
45. On the north face of the building, now largely internalised, the original brickwork is again highly disturbed, with various changes having occurred, including abrasive cleaning that has removed the original face of the brickwork. More obviously, a substantial addition of steel and glass has been made that largely obscures and encloses this elevation. The north elevation has had a large opening introduced to enable access from the steel and glass entry pavilion into the older envelope.
46. On the east, or railway side, the elevation has been drastically changed, with the ground floor truncated and a first floor of glass and steel imposed above.
47. In terms of roof form, the two part roofing evident in early photos, that illustrates the evolution of the site, has been removed, and a first floor introduced that is integrated with a new, modern roof form.
48. In summary, this is a very substantially altered building that is compatible with its broader heritage context in terms of its remnant red brickwork, but that is otherwise of low integrity and no identified significance. Its original appearance can only be conjectured at, and its historic use is not known and is not established as having any meaningful link with the neighbouring railway line and its bridges.
49. While the site has evidently had some link with the South Melbourne Cycling Club, this association is from the 1910s-1930s, not from the period suggested by the attached plaque. Moreover, the significance of the South Melbourne Cycling Club has not been established. Research undertaken in the preparation of this statement suggests it was not an important or highly active organisation even in the local context. For example, no reference to the club was made in the *Port Phillip Heritage Review* with regards to any aspect of thematic history. Similarly, in the *Jubilee History of the City of South Melbourne*, published in 1905, the South Melbourne Cycling club is only briefly referenced under 'Other Clubs' (page 10), being mentioned alongside the rifle and swimming club – in comparison, local cricket, football, bowling, rowing and tennis clubs each received their own sub-heading, indicating their relative

importance and popularity in the local area. Research undertaken in the preparation of this statement has not uncovered further information on the South Melbourne Cycling Club.

50. The building is effectively described as one of a number of buildings that are ancillary to the key elements of the place:

The steeply sloping sides of the railway cutting are grassed, and there are also a number of mature pepper trees (Schinus molle, a ubiquitous element along railway reserves such as these) and other plantings. A number of buildings have been erected alongside the railway cutting, variously fronting Ferrars Street or Ferrars Place. The scout hall, on Ferrars Place near Bridport Street, is a utilitarian red brick structure with buttress-like brick piers and a broad gabled roof. The premises of the South Melbourne Cycle Club at 335-337 Ferrars Street is a red brick building, apparently of Edwardian or inter-war vintage, which is enlivened by rendered stringcourses, scotia cornices and flat-arched windows with steel-framed casement sashes. There is also row of townhouses, of quite recent origin, at 339-349 Ferrars Street.

51. This said, there is no clear suggestion that the building makes any contribution to the significance of the place, any more than do the townhouses of modern origin to the south of the subject site that are also mentioned in this description, or the 4 storey apartments that have more recently been constructed to the north and are not mentioned.

52. The *Port Phillip Heritage Review Update* – February 2019 makes the recommendation to “Retain in heritage overlay HO440 and change the heritage status on the Port Phillip Heritage Policy Map to ‘significant’”. This recommendation seems to apply to the cutting land as a whole, rather than to the building in question in particular.

53. Any future works to the site would most likely be assessed against the policy settings at Clause 22.04 for ‘significant’ buildings. There would seem little basis for this given the extent to which the building has been altered, its modest at best historical interest, and its minimal contribution to the values identified in the statement of significance for the new Railway cutting and bridges heritage place.

54. Indeed, it is clear that the citation at present does not identify any aspect of the subject site that might suggest it meets the criterion of being a *‘individually important places of either State, regional or local heritage significance and are places that together within an identified area, are part of the significance of a Heritage Overlay’* i.e. the key criterion for being a ‘significant’ place.

55. Council, in part, recognised, that the methodology of regrading all the buildings within the curtilage as significant required further assessment in their minutes from a Council meeting held on 16 September 2020, which recommended to *‘Amend the Revised Citation for the Railway Cutting and Bluestone Bridges (Citation 2311) to specify those buildings which do not contribute to the significance of the railway cutting and bridges including the former South Melbourne Cycling Club where the significance has not been assessed or established’*.

56. The above said, in *Attachment 2 – Summary of Submissions and Officer Response*, associated with the Council meeting, officers provided the following comments in relation to the subject site (underlines are our emphasis)

Officers note that 335 Ferrars Street is currently included within HO440 as a 'Non-contributory' property. The heritage grading of the property is proposed to be amended through this amendment.

The intent of Amendment C161port is to address anomaly that exists where an individual citation exists for the Railway cutting and bridges (Citation 2311) however the grading is non-contributory.

In terms of background, the reason this property has been included in the Significant Heritage Place is because it is an un-subdivided parcel of land that forms part of the original railway reserve which is proposed to be included as 'Significant'. It is acknowledged that the parcel of land associated with the railway cutting and bridges also includes a number of buildings which do not relate to its significance, including the building referred to by the submitter. Officers consider that this should be acknowledged in the Citation so that it is clear.

However this particular building is the former premises of the South Melbourne Cycle Club at 335-337 Ferrars Street which is a red brick building, apparently of Edwardian or inter-war vintage, which is enlivened by rendered stringcourses, scotia cornices and flat-arched windows with steel-framed casement sashes (note that this association is demonstrated by an original plaque on the building), and while not associated with the railway cutting or bridges, may be of potential significance as an individual place. On that basis officers agree that changes should be made to note that the significance of the building has not been established, however recommend a further review to establish its significance.

57. As set out in the above history and discussion, while parts of the building appear to have an historical association with the South Melbourne Cycling Club dating from c.1910s-1930s, these associations do not date to 1881 as per the suggestion of the plaque. The building has also undergone numerous alterations over the past century and its fabric cannot be considered to be of individual significance.
58. Having regard for the above, I do not believe that the exhibited citation for the Railway cutting and bridges heritage place goes far enough to identify those buildings that are of no significance, or in the case of the subject building, of no related interest. While the citation can identify the key aspects of the land, ie the cutting and bridges, as 'significant', and possibly also reference some other heritage elements including the Scout Hall (accepting that it too has no historical relationship to the Railway cutting and bridges place), it should clearly specify that other items such as the subject building and the recent townhouses and apartments are not in themselves significant and/or are not contributory to the values of the place. This appears to have been accepted by Council as an appropriate action.
59. Alternatively, and preferably, the mapping in the citation and in the Heritage Policy Map could be amended to clearly identify the key elements of the Railway cutting and bridges only, and to leave out of the associated curtilage the land associated with buildings such as this that are not part of the significance of that place in any meaningful sense.

8.0 Conclusion

60. Having regard for all the above, it is my view that while it is appropriate for the subject site and surrounds to remain within the Heritage Overlay, the proposal to regrade the property 'significant' as part of a blanket regrade of its environs under Amendment C161port Part 2 to the Port Phillip Planning Scheme is not appropriate.

Attachment 1

Bryce Raworth CV



Bryce Raworth

CONSERVATION | HERITAGE

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 Frankston, Kingston and Stonnington, and is a member of the Advisory Board to the Australian Centre for Architectural History, Urban and Cultural Heritage, University of Melbourne (ACAHUCH).

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

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

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

Professional Status:	Conservation Consultant and Architectural Historian
Current Positions:	Conservation Consultant to the cities of Kingston, Frankston and Stonnington
Organisation Membership:	Australian Institute of Architects VPELA (Victorian Planning and Environmental Law Association)
Professional Experience:	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 member, Historic Buildings Council (architectural historian's chair) 1993-1996; member, Heritage Council (architect's chair) 1998-2002 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) 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
Studies:	Certificate of Architectural Conservation, ICCROM (International Centre for the Study of the Preservation and the Restoration of Cultural Property at Rome), 1994 Master of Architecture by thesis, University of Melbourne, 1993 (thesis: A Question of Style: Domestic Architecture in Melbourne, 1919-1942) B. Architecture (First Class Honours), University of Melbourne, 1986 B. Arts (Second Class Honours, Division A), University of Melbourne, 1986
Committee Membership:	Member of Advisory Board, ACAHUCH (Australian Centre for Architectural History, Urban and Cultural Heritage, University of Melbourne) Twentieth Century Buildings Committee, National Trust of Australia (Victoria), 1990-1994 (Chairman 1992-1993) RAIA Jury, Conservation Category, 1995, 1996, 1998 and 2001 Awards (Chairman 1996 & 1998)
Awarded:	Henry and Rachel Ackman Travelling Scholarship in Architecture, 1987-88 JG Knight Award, conservation of Heide 1, Royal Australian Institute of Architects, Victorian Chapter, 2003 Lachlan Macquarie Award for heritage (commendation), conservation of Heide 1, Royal Australian Institute of Architects National Award program, 2003 Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, Victorian Chapter, 2015 Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, National Awards, 2015

Attachment 2

Letter prepared by Bryce Raworth Conservation, dated 26 August 2020, submitted to Council and subsequently considered in its report on the Amendment.

26 August 2020

**Statutory Planning
City of Port Phillip**

To whom it may concern

Re: 335 Ferrars Street, South Melbourne
Proposed regrading of the subject site and its environs

This letter has been prepared at the request of the owners of the subject land, 335 Ferrars Street, South Melbourne. It is prepared in relation to the proposed regrading applicable to the subject site that is associated with a new citation and new heritage policy mapping for the surrounding environs, identified as *Railway cutting and bridges*. This citation was created as part of the *Port Phillip Heritage Review* (February 2019) by David Helms. In preparing this advice the site has been inspected, and a review undertaken of the relevant planning scheme provisions, along with applicable heritage studies including the *Port Phillip Heritage Review 2018*, an incorporated document, the *City of Port Phillip Heritage Policy Map January 2020* and the *Port Phillip Planning Scheme Amendment C161port Explanatory Report*. The analysis below draws upon a review of Clause 43.01, the Heritage Overlay provisions in the *Port Phillip Planning Scheme*, and Council's local heritage policy, Clause 22.04.

The key relevant changes contemplated within Amendment C161port are that the subject site and its environs have been taken out of the *St Vincent Place East* heritage precinct, known as HO440, and have been reclassified to sit within the *Emerald Hill Residential Precinct*, known as HO440 under the provisions of the Port Phillip Planning Scheme. The environs of the site have also received a specific citation, *Railway cutting and bridges*, Citation 2311, prepared as part of the Port Phillip Heritage Review (February 2019) by David Helms. This citation specifically identifies the subject site as a building within the *Railway cutting and bridges* heritage place. The *Railway cutting and bridges* heritage place is proposed to be graded 'significant', a change that has the effect of elevating the significance of the subject site from 'non-contributory' to 'significant'. This said, it is noted that the *Railway cutting and bridges* heritage place comprises the addresses 221-351 Ferrars Street & 332A Park Street, South Melbourne, including many buildings of little to no heritage significance. Paint controls apply under HO440, although tree controls and internal controls do not.

The subject property at 335 Ferrars Street is a thin rectangular shaped allotment with a frontage to Ferrars Street to the west, with off-site parking adjacent to the north. The built form on the site is a single-storey 20th century structure with rendered parapet that has been extended in similar brick to its south (without the same parapet detail) and with a modern glass and steel addition to the north. The site is located in a mixed street context containing a high proportion of buildings from different periods, with a number of visually dominant recent buildings on the east side of Ferrars Street.

Within Port Phillip, places are graded varying as 'Non-Contributory', 'Contributory' and 'Significant' with these gradings defined at Clause 22.04 as follows:

Significant heritage places include buildings and surrounds that are individually important places of either State, regional or local heritage significance and are places that together within an identified area, are part of the significance of a Heritage Overlay. These places are included in a Heritage Overlay either as an area or as an individually listed heritage place and are coloured "red" on the City of Port Phillip Heritage Policy Map in the Port Phillip Heritage Review, Volume 1-6.

Contributory heritage places include buildings and surrounds that are representative heritage places of local significance which contribute to the significance of the Heritage Overlay area. They may have been considerably altered but have the potential to be conserved. They are included in a Heritage Overlay and are coloured "green" on the City of Port Phillip Heritage Policy Map, in the Port Phillip Heritage Review, Volume 1-6.

Non-contributory properties are buildings that are neither significant nor contributory. They are included in a Heritage Overlay and have no colour on the City of Port Phillip Heritage Policy Map in the Port Phillip Heritage Review, Volume 1-6. However any new development on these sites may impact on the significance of the Heritage Overlay, and should therefore consider the heritage characteristics of any adjoining heritage place and the streetscape as covered in this policy.

The statement of significance included within the new citation for *Railway cutting and bridges* heritage place, 221-351 Ferrars Street & 332A Park Street, South Melbourne, is reproduced below:

What is significant?

The railway cutting extends for about 800 metres between the former South Melbourne and Albert Park railway stations. Originally excavated in 1856-57 as part of the St Kilda branch line of the Melbourne & Hobson's Bay Railway Company, this landscaped cutting includes three bluestone bridges at Dorcas, Park and Bank streets.

How is it significant?

The railway cutting and bridges are of local historic and aesthetic significance to the City of Port Phillip.

Why is it significant?

Aesthetically, the railway cutting is of significance as an important vista between the railway stations at South Melbourne and Albert Park. Extending in a straight line for almost a kilometre, this notably long view can be appreciated from several vantage points including the road bridges at Dorcas, Bank and Park streets, the footbridge at Coventry Street, and the level crossing at Bridport Street. The bridges themselves are important visual elements, punctuating the vista, while the grassed embankments and mature trees also contribute to its aesthetic qualities. It contrasts with many other early railway cuttings (eg that in Alma Park) which tend to be curved. (Criterion E)

Historically, the railway cutting and road bridges are of significance for their associations with the initial development of Melbourne's railway network in the 1850s. Although much of the actual railway infrastructure was removed following the line's conversion to a light rail, the cutting itself remains as one of the oldest and longest in the inner city area, while the three bluestone bridges are also rare and significantly early surviving examples of their type. (Criteria A & B)

We have been asked to comment on the merit (or otherwise) of the proposal to change the status of the subject site at 335 Ferrars Street, South Melbourne from 'non-contributory' to 'significant' as part of the proposed new *Railway cutting and bridges* heritage place. This change arises as a result of the 'blanket' regrading of the land associated with the *Railway cutting and bridges* heritage place.

Having reviewed the documentation associated with Amendment C161 and inspected the buildings in detail, while the inclusion within a Heritage Overlay is accepted, it is the view of this office that the grading of the subject site at 335 Ferrars Street, South Melbourne is not warranted. There is no obvious sign of the building's historic role or purpose other than the small sign on the exterior associated with the South Melbourne Cycle Club. While this sign dates from 1881, it is apparent that the central, oldest part of the building itself does not date from that period. Indeed, the building is not shown on either the 1895 MMBW detail plan for the area, nor the c1933-1950 MMBW detail plan for the area. On this basis it is assumed that all parts of the building date from some time after 1930.

The sole reference to the building in the *Port Phillip Heritage Review Update – February 2019*, within the content of its discussion of the broader heritage place is as follows:

The premises of the South Melbourne Cycle Club at 335-337 Ferrars Street is a red brick building, apparently of Edwardian or inter-war vintage, which is enlivened by rendered stringcourses, scotia cornices and flat-arched windows with steel-framed casement sashes.

The relationship of the plaque with the place is unknown, insofar as the plaque clearly predates the subject building and its additions by decades. There would seem little intrinsic link between a use such as the Cycle Club and the identified significance of the *Railway cutting and bridges* heritage place.

The building is effectively described as one of a number of buildings that are ancillary to the key elements of the place:

The steeply sloping sides of the railway cutting are grassed, and there are also a number of mature pepper trees (Schinus molle, a ubiquitous element along railway reserves such as these) and other plantings. A number of buildings have been erected alongside the railway cutting, variously fronting Ferrars Street or Ferrars Place. The scout hall, on Ferrars Place near Bridport Street, is a utilitarian red brick structure with buttress-like brick piers and a broad gabled roof. The premises of the South Melbourne Cycle Club at 335-337 Ferrars Street is a red brick building, apparently of Edwardian or inter-war vintage, which is enlivened by rendered stringcourses, scotia cornices and flat-arched windows with steel-framed casement sashes. There is also row of townhouses, of quite recent origin, at 339-349 Ferrars Street.

This said, there is no clear suggestion that the building makes any contribution to the significance of the place, any more than do the townhouses of modern origin.

Upon inspection, a number of significant alterations have occurred on the subject site. These include but are not limited to the following:

- *the building has undergone a substantial extension to the south, possibly quite recently or possibly in the 20th century, with detailing that is a simplified version of the original facade;*
- *a glass, steel and render 'entry' extension has been made to the north in recent years;*
- *windows facing Ferrars Street have all been altered with the introduction of a metal 'shroud' detail and with modern fixed single pane glazing;*
- *some sections of the façade to Ferrars Street have been altered (ie partially bricked up, or windows introduced, etc), and the façade shows signs of partial repointing that may indicate areas of change;*
- *the profile and detailing of the roof have been altered to the extent it presents as a 'modern' roof type;*
- *from the rear (railway side), an upper level addition, or highlight glazing, is readily apparent as part of the altered roof form.*

The *Port Phillip Heritage Review Update – February 2019* makes the recommendation to "Retain in heritage overlay HO440 and change the heritage status on the Port Phillip Heritage Policy Map to 'significant'". This recommendation seems to apply to the cutting land as a whole, rather than to the building in question in particular. This said, any future works to the site would most likely be assessed against the policy settings at Clause 22.05 for 'significant' buildings. There would seem little basis for this given the extent to which the building has been altered, its modest at best historical interest, and its minimal contribution to the values identified in the statement of significance for the new Railway cutting and bridges heritage place.

Indeed, it is clear that the citation at present does not identify any aspect of the site that might suggest it meets the criterion of being a 'representative heritage place(s) of local significance which contribute(s) to the significance of the Heritage Overlay area', ie the key criterion for being a 'contributory' place.

While the citation and other documents pertaining to the proposed changes are in general thorough and robust in relation to the core subject matter of the railway cutting and bridges, the methodology of regrading all the buildings at 221-351 Ferrars Street & 332A Park Street, both older and newer, as 'significant' is too general and requires attenuation within the citation. This is of particular importance to the buildings that are of little to no significance, including the subject site.

Having regard for this, while the citation can identify the key aspects of the land, ie the cutting and bridge, as 'significant', and possibly also some other elements including the Scout Hall, it should also specify that some other items are not in themselves significant. In particular, the citation should be amended to itemise that the subject building is of little to no significance at best, and the recent townhouses and apartments are of no significance.

This office does not believe that the citation goes far enough to identify those buildings that are of no significance, or in the case of the subject building, of little to no significance.

Please contact this office if you have any queries in relation to the above.

Bryce Raworth Pty Ltd