

3.2 Roseberry Street, Hawthorn East - Heritage assessment

Abstract

On 29 July 2021, Council received a community nomination to include Roseberry Street, Hawthorn East in the Heritage Overlay either as a standalone precinct or as an extension to the Brickfields Environs Precinct.

Council's heritage consultant, Context, considered Roseberry Street for inclusion in the Heritage Overlay both as a standalone heritage precinct and as part of the Brickfields Environs Precinct in the Hawthorn East Heritage Gap Study. Context did not recommend Roseberry Street be included in the Heritage Overlay on the basis of its markedly lower intactness than other streets in the Brickfields Environs Precinct.

Following the community nomination, Officers referred the nomination and all information provided by community members to Context for consideration and to advise whether the information provided contains new information which would warrant a change to their original recommendation.

Concurrently, Officers commissioned Extent Heritage to carry out a peer review of the original advice provided by Context, and to prepare an independent assessment of the community nomination and the merits of including Roseberry Street in the Heritage Overlay. Extent Heritage was also provided with all the material submitted by community members.

Both consultants have now concluded their assessments and agree Roseberry Street does not warrant protection through the Heritage Overlay.

Context do not consider the information provided by the community provides any compelling new evidence to call into question the decision to exclude Roseberry Street from the Heritage Overlay.

Similarly, the independent heritage assessment carried out by Extent Heritage confirms the position taken by Context. Extent Heritage conclude Roseberry Street does not meet the threshold for inclusion in the Heritage Overlay either as part of a precinct extension of the Brickfields Environs Precinct, or as a heritage precinct in its own right.

In the absence of expert heritage consultant advice supporting the inclusion of Roseberry Street in the Heritage Overlay, Council would not, in the officer's view, be successful in receiving authorisation from the Minister for Planning to prepare and exhibit a planning scheme amendment to include Roseberry Street in the Heritage Overlay.

Based on professional advice provided by two qualified and experienced heritage consultants, officers recommend no further action in regard to this matter.

Officers' recommendation

Officers recommend the Urban Planning Delegated Committee resolve to:

1. Note and accept the heritage assessment and peer review undertaken by Context and Extent Heritage on the heritage value of Roseberry Street, Hawthorn East contained at **Attachments 1 and 2**, as annexed to the minutes.
2. Take no further action with regards to the introduction of a Heritage Overlay in Roseberry Street, Hawthorn East.

Responsible director: Nick Lund, Acting Director Urban Living

1. Purpose

The purpose of this report is to:

- Brief the Urban Planning Delegated Committee (UPDC) on the outcomes of the heritage assessment by Context and independent peer review by Extent Heritage.
- Seek a resolution from the UPDC to take no further action relating to the inclusion of Roseberry Street, Hawthorn East in the Heritage Overlay.

2. Policy implications and relevance to community plan and council plan

Council Plan 2017-2021

The investigation of the heritage significance of Roseberry Street, Hawthorn East is consistent with the strategic objective to 'Protect the heritage and respect the character of the City to maintain amenity and liveability whilst recognising the need for appropriate, well-designed development for future generations' under Theme 4 - Neighbourhood Character and Heritage.

Boroondara Community Plan 2017-27

The Boroondara Community Plan 2017-27 sets out the 10 year vision for Boroondara's future based on values, aspirations and priorities important to the community.

The heritage assessment is consistent with Strategic Objective 4 of the Plan: Protect the heritage and respect the character of the City to maintain amenity and liveability while recognising the need for appropriate, well-designed development for future generations.

Heritage Action Plan 2016

The Heritage Action Plan was adopted by Council on 2 May 2016 and establishes the framework to guide Council's heritage work program as it relates to the identification, protection, management and promotion of Boroondara's heritage assets.

The investigation of Roseberry Street, Hawthorn East is consistent with the following action of the Heritage Action Plan 2016:

- H1 - Prepare and implement a heritage study of Hawthorn East as part of the municipal wide heritage gap study.

Boroondara Planning Scheme

The heritage assessment of Roseberry Street, Hawthorn East is consistent with the objectives of the Planning Policy Framework (PPF) and Local Planning Policy Framework (LPPF). In particular it addresses the following Clauses:

- Clause 15.03-1s *Heritage Conservation* which seeks to ‘ensure the conservation of places of heritage significance’ by identifying, retaining and protecting places with identified heritage significance;
- Clause 21.04-5 - *Built Environment and Heritage* of the Municipal Strategic Statement which includes the objective ‘to identify and protect all individual places, objects and precincts of cultural, aboriginal, urban and landscape significance’; and
- Clause 22.03-2 Heritage Policy which seeks to ‘preserve ‘significant’ heritage places, protecting all significant heritage fabric including elements that cannot be seen from the public realm’.

Both the PPF and LPPF seek to ensure the Heritage Overlay is applied to protect places of heritage significance in the City of Boroondara where this can be justified through a heritage assessment.

Plan Melbourne 2017-2050

The identification, assessment and protection of places of local heritage significance are supported by Outcome 4 of *Plan Melbourne* which seeks to ensure ‘Melbourne is a distinctive and liveable city with quality design and amenity’. Direction 4.4 recognises the contribution heritage makes to Melbourne’s distinctiveness and liveability and advocates for the protection of Melbourne’s heritage places.

Planning and Environment Act 1987

The investigation of the heritage significance of Roseberry Street, Hawthorn East is consistent with the objectives of planning in Victoria, in particular the objective detailed in Section 4(1)(d) of the *Planning and Environment Act 1987* (the Act), being:

To conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value.

This means Council has a statutory obligation to continuously identify and protect places of heritage significance through the Heritage Overlay where the heritage significance can be demonstrated through a heritage assessment.

3. Background

Municipal Wide Heritage Gap Study

On 25 July 2016, Council resolved to engage heritage consultants, Context, to commence the Municipal Wide Heritage Gap Study (MWHGS). The MWHGS is a proactive work program to identify and protect valued heritage properties and precincts through inclusion of properties in the Heritage Overlay.

The study has two components: a street-by-street assessment of properties not currently included in the Heritage Overlay; and implementation of heritage controls to properties recommended for heritage protection by the assessment.

The Heritage Overlay is the mechanism which allows Council to protect heritage places of local significance. Inclusion of properties and precincts in the Heritage Overlay triggers planning permit requirements for demolition, alterations and additions, and new buildings.

Hawthorn East Heritage Gap Study

Preparation of the Hawthorn East Heritage Gap Study commenced in 2017 with a draft study completed in mid-2018.

Context initially identified Roseberry Street for further investigation as part of Stage 1 of the study due to its stock of Victorian houses. It was earmarked for further investigation as part of a larger precinct centred on the former Hawthorn Brickworks.

While a draft history was prepared for the potential Brickworks Environs Precinct to include Roseberry Street during Stage 2 of the study, a detailed survey of the street found the street had a lower degree of intactness than other streets in the proposed Brickfields Environs Precinct linked to the brickworks and from a similar period of development (beginning in the 1880s). Further historical research also did not identify any strong links to the brickworks.

Preliminary consultation on the draft Study was undertaken in July/August 2018 and involved sending a letter to all property owners and occupiers within the Hawthorn East suburb. No feedback was received arguing for the protection of Roseberry Street, Hawthorn East.

On 17 December 2018 the Urban Planning Special Committee resolved to adopt the Hawthorn East Heritage Gap Study and commence the formal planning scheme amendment process to implement the recommendations of the study (Amendment C308boro).

Exhibition of the amendment occurred in May/June 2019 and again no submissions were received requesting the investigation of Roseberry Street or its inclusion in the Heritage Overlay.

Council adopted the amendment at its meeting on 24 May 2021 and is currently awaiting the Minister's decision whether to approve the amendment.

4. Outline of key issues/options

Community nomination

On 29 July 2021, Council received a community nomination seeking the inclusion of Roseberry Street, Hawthorn East in the Heritage Overlay. Specifically, the nomination argued:

- Roseberry Street should be included in the Heritage Overlay as a precinct extension to Brickfields Environs Precinct (HO841 interim control, Amendment C308boro);
- Roseberry Street has historical significance under HERCON Criterion A as a result of its links to the Hawthorn Brickworks and the theme of "working class houses";
- Roseberry Street has a Victorian workers cottage streetscape, with intact and contributory graded houses satisfying HERCON Criteria D and E; and
- Roseberry Street provided one or two entrances to the brickworks thereby demonstrating its close relationship.

Context heritage assessment

Context has reviewed the information provided as part of the community nomination. The intent of the review was to determine whether there was new information previously not considered which might change the assessment and recommendation.

Specifically, Context considered three particular aspects based on the information provided as part of the nomination:

- The share of contributory properties.
- Property ownership by the Fritsch and Holzer families.
- Physical links between Roseberry Street and the brickworks.

Overall, Context concluded no evidence has been submitted which would justify the inclusion of Roseberry Street in the Heritage Overlay. The level of intactness, in their view, too low to justify inclusion. The research into the role of the Fritsch and Holzer families as well as the brickworks company has not discovered any substantive evidence of systematic ownership and/or development of all or part of the street by either family. Similarly, Context found no evidence of the participation of the Fritsch and Holzer families or their brick company in the development of Roseberry Street, either in its creation or construction of housing for themselves or workers.

A copy of the heritage assessment undertaken by Context is contained at **Attachment 1**.

Extent Heritage independent peer review

Extent Heritage was engaged to carry out a peer review of the original advice provided by Context and to prepare an independent assessment of the community nomination and the merits of including Roseberry Street in the Heritage Overlay.

In undertaking their peer review and assessment, Extent Heritage followed the following methodology:

- A review of all documentation including the previous Context assessment and supporting documents provided as part of the nomination.
- Visual assessment of the street through a site visit.
- Review of heritage grading of the proposed precinct and properties within the street to determine overall intactness.
- Analysis of overall integrity of the proposed precinct.
- A condition assessment to identify significant fabric and what maintenance and repair work would be required to maintain the significance.

Based on their assessment and peer review, Extent Heritage concluded Roseberry Street does not meet the threshold for local significance in the City of Boroondara under the HERCON criteria, either as part of an extension of the Brickfields Environs Precinct (HO841 interim control, Amendment C308boro) or as a standalone precinct. Extent Heritage therefore confirmed Context's findings.

Specifically, Extent Heritage concluded:

- The street has a low level of intactness with only 58% contributory properties. Extent Heritage considered this level of intactness very low for a precinct within Boroondara.
- The streetscape cannot be considered representative of, or important to an understanding of, this historical period owing to its low integrity.
- No archival evidence was provided to support the claim one or two entrances existed to the brickworks from the street.

A copy of the heritage assessment undertaken by Extent Heritage is contained at **Attachment 2**.

Conclusion and next steps

Given both heritage consultants have concluded Roseberry Street, Hawthorn East does not meet the threshold for inclusion in the Heritage Overlay either as a standalone precinct or an extension to the Brickfields Environs Precinct, officers recommend no further action be undertaken.

In the absence of a recommendation from an expert heritage consultant to include Roseberry Street in the Heritage Overlay, officers do not believe Council would be successful in receiving authorisation from the Minister for Planning to prepare and exhibit a planning scheme amendment to include Roseberry Street in the Heritage Overlay.

5. Consultation/communication

All property owners and occupiers within Roseberry Street and any party who wrote to Council in support of the heritage nomination of Roseberry Street have been notified in writing of this UPDC meeting.

6. Financial and resource implications

Costs associated with the heritage assessment and peer review carried out by Context and Extent Heritage will be funded through the MWHGS Priority Project Budget for the 2021/22 financial year.

7. Governance issues

The officers responsible for this report have no general or material interests requiring disclosure.

The implications of this report have been assessed and are not considered likely to breach or infringe upon, the human rights contained in the *Victorian Charter of Human Rights and Responsibilities Act 2006*.

8. Social and environmental issues

While not including Roseberry Street in the Heritage Overlay will not bring the social benefits usually associated with the protection of identified heritage places, the Heritage Overlay can only be applied where justified.

Manager: David Cowan, Acting Manager Strategic and Statutory Planning

Report officer: Christian Wilmsen, Acting Coordinator Strategic Planning
Robert Costello, Acting Principal Strategic Planner



24 August 2021

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Our Ref: 2364 Boroondara Heritage Advice

Re: Nomination of Roseberry Street, Hawthorn East

Dear Rob,

Thank you for requesting a review of the Community Submission dated 29 July 2021 proposing inclusion of Roseberry Street, Hawthorn East, in the Heritage Overlay, potentially as part of HO841 Brickfields Environs Precinct.

This letter sets out the previous investigation of Roseberry Street as part of the Hawthorn East Heritage Gap Study in 2018, and then considers the questions raised and information provided in the Community Submission.

Heritage Gap Study investigation

The Hawthorn East Heritage Gap Study (the 'Gap Study') was carried out in two stages. In Stage 1 the entire suburb was surveyed by bicycle and on foot with individual properties and streetscapes identified for further investigation. This further investigation took place in Stage 2 of the Gap Study, at which point heritage citations were prepared for individual properties and precincts found to meet the threshold of local significance and recommended for inclusion in the Heritage Overlay.

Roseberry Street was one of the streets identified in Stage 1 for further consideration due to its stock of Victorian houses. It was earmarked for further investigation as part of a larger precinct centred on the former Hawthorn Brickworks, owned by the Fritsch and Holzer families.

The initial rationale for further investigation of what was tentatively called the 'Brickworks housing precinct' was:

A close subdivision possibly related to the Fritsch Holzer Brickworks at its centre. Houses are mainly Victorian, with some Edwardian, and more interwar. If this whole development period can be shown to have been the primary housing for brickworks employees, it may be of historical significance.

During Stage 2, a draft history was prepared for the potential Brickworks Environs Precinct, with the following text regarding Roseberry Street:

www.contextpl.com.au

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The Grove Estate was subdivided into 81 lots fronting Auburn Grove, Garfield Street (later Roseberry Street) and Camberwell Road, which were auctioned in 1884. Not all the allotments sold, and another auction was held in 1885. ...

Originally named Garfield Street as part of the Grove Estate subdivision in 1884, Roseberry Street was in existence by 1905. The construction of houses in the street commenced in 1887 (numbers 68 and 70 were owned by the Fritsch family), with six houses built by Edward Heron and eight by Robert Lynch; by 1905, 41 homes had been built on the north side of Roseberry Street and 36 on the south of the street. Numbers 2 and 4 Roseberry Street were built in 1914 (McWilliam 2004:66; McWilliam 2007:8).

Houses at 40 and 42 Roseberry Street were built in the 1930s, and residences at 22, 24 and 55 in the 1940s (McWilliam 2007:8).

Following detailed, property-by-property survey of the potential precinct, Roseberry Street was found to be of a markedly lower intactness than other streets in the potential precinct. This was both in terms of intrusive new development breaking up groups of Victorian houses, particularly at the west end around Munro Street, and relatively low intactness of the majority of the Victorian houses (most have rebuilt front verandahs).

The project historian was then asked to undertake additional research to determine how closely Roseberry Street's development was linked with the Fritsch-Holzer's brickworks. It was thought that a very strong historical link, for example development of a substantial part of Roseberry Street to house brickworks employees, would overcome the lower level of intactness of the street.

No strong links for the street or a large part of the street, however, were identified in this further research. In the 1896 rate books one vacant block was owned by August Fritsch (on which houses at 82 & 84 were built prior to 1903) and one house was owned and occupied by brickmaker Henry Holzer (73 Roseberry Street). No other land or houses on Roseberry Street were owned by the Fritsch or Holzer family at that time, and no other 'brickmakers' were identified as owners or occupiers on the street. It was clear that this was not a grouping of "company housing" associated with the brickworks.

As there was no compelling link to the brickworks, though undoubtedly employees lived there over the decades, Roseberry Street was dropped from the potential precinct due to the lower level of overall intactness. In addition, no houses of potential individual significance were identified on this street.

New information provided by Community Submission

1. Number of potential Contributory properties

The Community Submission (p.2) notes that Roseberry Street 'contains approximately 47 heritage grade houses, mostly constructed in the 1880's and 1890's'. This is within a street that contains 92 properties, so the overall proportion of potentially Contributory properties is about 50 percent. Even if the modern development at the east end (85-87 & 80-96 Roseberry Street) were not included in a precinct or precinct extension, this would be 47 Contributory properties of a total 83 properties, so 57 percent in all. This is a far lower percentage of Contributory properties than seen in the current Brickfields Environs Precinct, demonstrating the reason that Roseberry Street was left out of the precinct. It is also lower than the rule-of-thumb for at least two-thirds Contributory/Significant properties in a heritage precinct.

The Community Submission (p. 6) notes that 10 houses on the street were identified as having heritage value in the 1993 Hawthorn Heritage Study. This is true, but all of them were given a preliminary "C"

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grade, which is equivalent to a current “Contributory” grade. Under current Victorian planning regulations, properties of Contributory quality must be grouped together in a precinct of local significance before they warrant inclusion in the Heritage Overlay.

2. Property ownership by the Fritsch and Holzer families

The Community Submission contains research about property ownership by members of the Fritsch and Holzer families. This includes:

- 73 Roseberry Street – owned and occupied by Henry Holzer, a brickmaker and son of company founder. As noted above, this information was confirmed in Context’s original research into the history of the potential precinct. This house survives. It is a modest single-fronted timber house, part of a once-identical row at 69-75 Roseberry Street. No. 73 has been altered with the loss of its original windows, verandah cast-iron and possibly verandah posts. There is a photo of it in the Community Submission:



- Between 80 & 90 Roseberry Street – land owned by August Fritsch (either one of the founders or his architect son). As noted above, this information was confirmed in Context’s original research into the history of the potential precinct. Referring back to the 1896 ratebook entry and the 1903 MMBW Detail Plan (No. 1543), this land corresponds to 82 & 84 Roseberry Street. A semi-detached pair of dwellings had been constructed there by 1903, but both have since been demolished.
- 11 & 80 Roseberry Street – the Community Submission notes that ‘Other Holzer family members lived at 11 and 80 until the 1930’s and 1940’s at least’. Referring to Sands & McDougall’s Street directories, in 1910 only No. 73 was occupied by a Holzer (no Fritsches). In 1920 and 1930, John Holzer also resided at No. 11. In 1938, the resident at No. 11 was Mrs Emma Holzer. Through

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this time period (1910-38), the resident listed at 80 Roseberry Street was a Mrs Clara Dixon. In 1942, however, she was replaced by Herbert Holzer, making two Holzers on the street at that time.

80 Roseberry Street has been demolished and replaced since then. The Victorian house at 11 Roseberry Street survives. It is very similar to No. 73, being a single-fronted timber cottage with alterations including non-original front verandah and front door (both are incorrect in form and detail), as well as a two-storey rear addition. It is shown in a RealEstate.com.au image from 2009:



- 88 Roseberry Street – the Community Submission notes that ‘The Fritsch Holzer Brick Company owned land at 88 Roseberry in 1968’. This may be the case, but it was long after the establishment period of the street and its built form. Note that there is a modern semi-detached house on this site constructed c1998, so it has no connection to the period of ownership by the Company.
- 58-60A Roseberry Street - the Community Submission notes information passed down from former to current long-term residents of the street that ‘the street was long known as a place that workers from the Fritsch Holzer Brickworks lived and that the brickworks company was involved with houses on the street; either via owning them, or providing them as accommodation for workers and managers’. They also stated that ‘Long term residents recall a group of Victorian weatherboard cottages’ that were owned by Council, and could have been owned by the Brick Company prior to that. These are 58-60A Roseberry Street, where all Victorian houses have been demolished and replaced.

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To conclude, the Community Submission has confirmed Context's earlier research: that there was ownership of a small number of properties on this street by members of the Fritsch and Holzer families, and one of them lived on the street during its foundational period (late 19th and early 20th century).

While the new research has revealed that one or two members of the Fritsch and Holzer families continued to reside on the street until at least the mid-20th century, no evidence has been found that there was systematic ownership and/or development of all or part of the street by the families or their company.

Furthermore, the only surviving house *built for* a Holzer (or Fritsch) is a very modest and altered house at No. 73. Holzers moved to the Victorian house at 11 Roseberry Street between 1910 and 1920, so this house was not built for them originally. It is similarly typical of its era and altered externally. All other houses identified as being owned or occupied by Fritsches or Holzers have been demolished.

There may have been more extensive property ownership by the Hawthorn Brick Company in the 20th century, but this would require much more research to confirm. It also raises the question of whether a gradual buy-up by the Company of existing properties in the 20th century would markedly add to the street's heritage significance. It would certainly be far less than if the Hawthorn Brick Company had actually *developed* all or part of the housing on the street.

Physical links between Roseberry Street and the brickworks

There are a number of questions raised and speculations made in the Community Submission about physical links between Roseberry Street and the brickworks. While Council's records from the time the Fritsch-Holzer Park was created on the former site of the brickworks could shed more light on these questions, they can be answered from other sources.

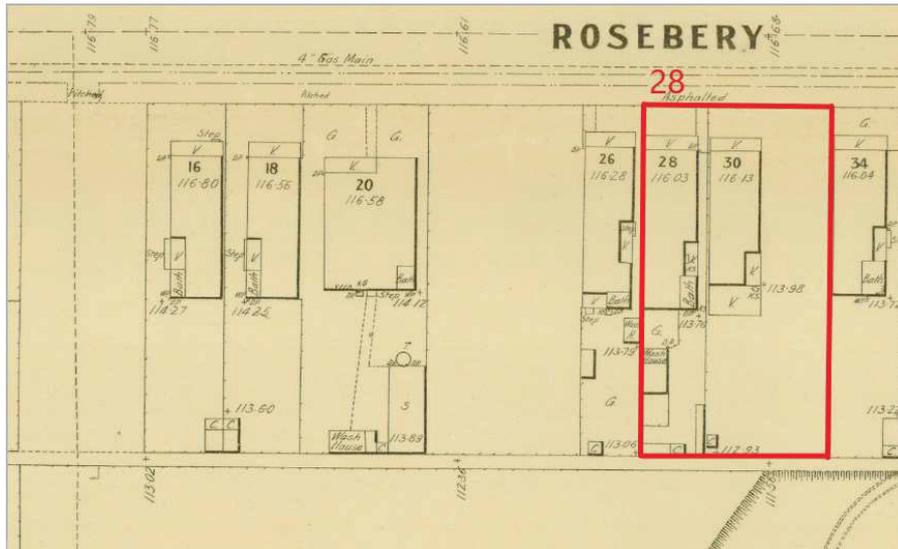
The Community Submission theorises that there were one or two historic entrances to the brickworks off Roseberry Street, which would provide a strong historical physical connection between the two. They posit that one may have been in the same place as the current pedestrian entrance to the Fritsch Holzer Park at 28 (or 28-32) Roseberry Street and/or 90-92 Roseberry Street.

MMBW plans from 1902 (No. 57) and 1903 (No. 1543) and an aerial photo (1945) have been examined to see if there was an entrance from Roseberry Street to the Brickworks, prior to conversion to a park.

1. 28-32 Roseberry Street

In 1903, this land was already developed with three houses, enclosed by fences. There was no formal or informal path to the Brick Works. Note that No. 32 backed directly onto the edge of the clay pit, so this would have been an extremely dangerous location for an entry. These properties are marked on the extract from MMBW Detail Plan No. 1543, on the following page. (NB: The house numbers on Roseberry Street have remained the same since this time).

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Moving forward in time, the 1945 aerial (below) shows that a house had been constructed in the side yard of No. 30 (now No. 32), and the houses at Nos 28 & 30 remained.



CONTEXT

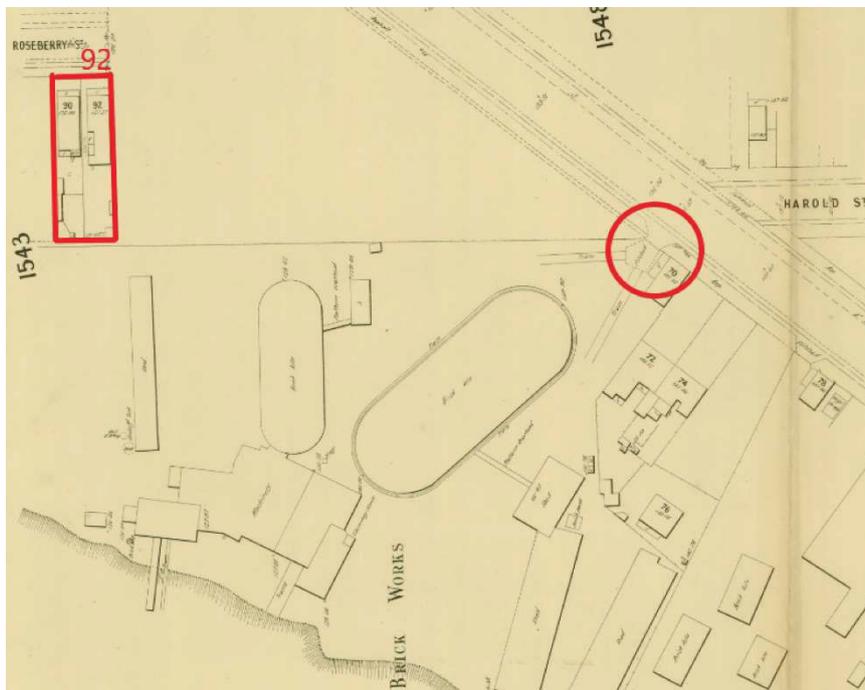
In summary, there is no evidence of an early link between Roseberry Street and the Brickworks at No. 28 or 28-32.

The submitters seem to have been confused by the vacant blocks shown on the 1903 MMBW Detail Plan, thinking that one of them corresponded to No. 28. (On page 38, they state: 'The current laneway into the FH park near number 26 would seem to correspond with one of these undeveloped areas shown' on the 1903 MMBW plan.) There is no evidence that these other vacant blocks provided an accessway to the Brickworks either. The land to the west (left) of 16 Roseberry Street became part of the Munro Street extension (by 1914), and the land at Nos. 22-24 Roseberry Street contains a c1940 semi-detached pair.

2. 90-92 Roseberry Street

The Community Submission also theorises that there was an accessway between 90 & 92 Roseberry Street.

In 1903, Roseberry Street did not yet extend to Camberwell Road, but halted in a dead end at 92 Roseberry Street. At this time, there were houses at 90 & 92 Roseberry Street (No. 92 survives), but vacant land at 86 & 88 Roseberry Street just to their west. As shown on MMBW Detail Plans 1543 and 1545, there were only two entrances to the brickworks at this time, one off the end of Bowler Street (then Fritsch Road) and the other off Camberwell Road, opposite the outlet to Harold Street. An excerpt from MMBW Detail Plan 1545, of 1903, is shown below, with the Camberwell Road entrance circled:



CONTEXT

The 1945 aerial shows a similar situation in regard to the two main entrances to the brickworks (off Bowler Street and Camberwell Road). There are houses present at 86-92 Roseberry Street.

By this time, Roseberry Street had been extended to Camberwell Road. The land that comprises today's 94-96 Roseberry Street appears to be part of the brickworks site, but it is separated from Roseberry Street by a line of trees or hedge (and presumably a fence to keep people out of this industrial site). This aerial shows a number of dirt tracks within the brickworks site, but none of them lead from Roseberry Street:



In conclusion, the current gap between 90 and 92 Roseberry Street, thought to be the location of a former accessway to the brickworks, was occupied by a house between at least 1903 and 1945. Furthermore, the 1903 plans and 1945 aerial have not indicated any accessways/paths at all between Roseberry Street and the brickworks.

Conclusions

It is agreed with the Community Submission that there have been connections between the Fritsch and Holzer families and some individual properties on Roseberry Street. Further research into title certificates would likely reveal several more owned by these prominent and well-off local families.

What has not been documented to any degree is the *participation* of the Fritsches, Holzers or their Hawthorn Brick Company in development of Roseberry Street, either its creation or construction of housing for themselves or workers. Only one surviving house appears to have been built as a Holzer family home (73 Roseberry Street), the others built for them have been demolished.

Furthermore, the "oral histories" positing that there were pedestrian or vehicular paths or accessways between Roseberry Street and the brickworks has not been borne out by any evidence. While it is possible that a

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brickworks employee could have gone out their back fence to the brickworks, this was not formalised, particularly as the south side of Roseberry Street sat at the edge of a deep clay pit.

In conclusion, no compelling evidence has been provided by the Community Submission to call into question the decision during the Hawthorn East Gap Study to exclude Roseberry Street from the proposed precinct. As discussed, this was due to its markedly lower overall level of intactness (particularly the percentage of potential Contributory properties) than other streets in the proposed precinct that have the same historical associations (informally linked to the brickworks) and a similar period of development (beginning in the 1880s).

Regards,



Natica Schmeder
Built Heritage Specialist



25 August 2021

Attention: Robert Costello (Principal Strategic Planner (Acting))
 City of Boroondara
 8 Inglesby Road
 Camberwell VIC 3124

Dear Robert,

Peer Review of Precinct Nomination - Roseberry Street, Hawthorn East

I write in regard to your request for a peer review in relation to a community nomination to include Roseberry Street, Hawthorn East on the Heritage Overlay, either as part of the Brickfields Environs Precinct (HO841 interim control, Amendment C308) or as its own precinct.

The methodology used in the preparation of this peer review accords with the principles and definitions set out in the Australia ICOMOS Charter for Conservation of Places of Cultural Significance (the Burra Charter) (Australia ICOMOS 2013); *Planning Practice Note 1: Applying the Heritage Overlay* (DELWP 2018); and the Heritage Victoria Model Consultants Brief for Heritage Studies (Heritage Victoria 2010).

Extent Heritage has not been engaged to assess historical archaeology or Aboriginal cultural heritage places and values. No community consultation was undertaken for this assessment however a community precinct nomination has been considered.

The following letter sets out the methodology used to formulate the advice, an overview of relevant background information, a heritage assessment of Roseberry Street and provision of final recommendations.

Should you wish to discuss the advice outlined in this letter further, please do not hesitate to contact me.

Kind regards,

Corinne Softley
 Senior Associate | Extent Heritage

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Assessment Methodology

Documentation review

The following documentation has been reviewed as part of this peer review advice:

- Brickfields Environs Precinct citation, adopted in the Hawthorn East Heritage Gap Study;
- Previous heritage advice on Roseberry Street provided by Natica Schmeder (Context Pty Ltd) in relation to the Hawthorn East Heritage Gap Study; and
- Community nomination document, including background resources.

Site inspection

A site inspection of Roseberry Street was undertaken by Extent Heritage on 12 August 2021. The inspection was undertaken as a visual assessment from the public domain. Each property was photographed and assessed for its condition and integrity.

Grading of significance

The nominated precinct was analysed to understand the common theme and level of significance of Roseberry Street. To support this analysis, particularly with regards to Criterion D: Representativeness and Criterion E: Aesthetic significance, a high level precinct designation assessment was undertaken to understand the relative contribution of individual properties towards the significance of the study area as a whole.

As per Heritage Victoria's model brief for consultants (DEWLP 2012, 6), the following can be applied to each place as relevant:

- Contributory: elements that contribute to the significance of the precinct;
- Non-contributory: elements that do not make a contribution to the significance of the precinct; and
- Individually Significant: a place that is both individually significant, independent of its context within the precinct, and contributes to the significance of the precinct.

Each individual property was given a designation based on the above criteria. This designation generally took into consideration the aesthetic and representative attributes of the place (similar fabric, construction era, intactness etc.), relative to the common historical theme upon which the precinct was nominated.

For the purposes of this study, overall 'intactness' of the precinct was measured as percentage of contributory places with 'low' being less than sixty per cent, 'moderate' being sixty to eighty per cent, and 'high' being eighty to a hundred per cent. Generally speaking, a potential precinct would be expected to have at least 'moderate' intactness but preferably 'high' intactness. In some cases, this assessment can help to identify which portion of a nominated precinct should be recommended for the HO and which parts should be excluded from the curtilage. As the



precinct has been considered in relation to Brickfields Environs Precinct (HO841 interim control, Amendment C308), this analysis has also compared the proportion of contributory properties in the HO (refer Figure 1) as a benchmark for assessing the nominated extension.

Integrity grading

A critical aspect in assessing the significance of a property is a consideration of overall integrity. The integrity of a place in respect to a heritage place is defined by the intactness of the heritage fabric, setting and/or history from which it purports to draw its significance.

It is important to note that integrity is not the only factor taken into consideration when assessing the overall significance of a place. There may be instances where a place that is deemed to be 'individually significant' or 'contributory' is of moderate or even low integrity. An example may be a site which has retained a significant use over time but has been heavily changed. The gradings are a guide only and must be subject to consideration on a site-by-site basis.

Table 1. Grading of integrity.

Integrity	Description	Significance Level Guide
High	The building appears to be very intact externally with little change to the principal elevations (i.e. façade, visible roof form and side walls). Most, if not all, of the other original detailing is intact. Other features that contribute to the setting of the place, such as fences, garden plantings, may be intact.	Contributory or Individually Significant
Moderate	Minor alterations have been made however much of the original form and detailing remains intact. Where materials or detailing have been replaced, similar or 'like for like' materials have often been used. Where changes have been made they are often reversible. Where additions have been made they are designed to respect and not overwhelm the original building.	Contributory
Low	Major alterations or additions have been made to the building, often to the extent that the original form and style is hard to recognise. Many of the changes are not readily reversible.	Non-contributory

Condition Assessment

Another important aspect in assessing the significance of a property is a consideration of overall condition. Condition assessments can assist in identifying significant fabric and what maintenance or repair work may be required to maintain that significance. The condition assessment was undertaken through the public domain inspection. A condition grading was provided for each place or precinct based on the definitions outlined below.



Table 2. Grading of condition.

Condition	Description
Good	Little to no maintenance and repair works required.
Fair	Some maintenance and repair works required.
Poor	Significant maintenance and repair works required.

Brickfields Environs Precinct

The statement of significance of significance for the Brickfields Environs Precinct is as follows:

What is significant?

The Brickfields Environs Precinct, comprising 3-23 & 2-24 Aberdeen Street; 1-33 & 4-46 Bowler Street; 1-25 & 2-20 Carnarvon Street; 1-37 & 2-42 Caroline Street; 61-75 & 52-74 Fletcher Street; 1-31 & 2-18 Loch Street; 1-41 & 2B-28 Munro Street, Hawthorn East, is significant. These streets were largely created by two 1888 subdivisions around what was then the Hawthorn Brick Works (now Fritsch-Holzer Park), established in 1883 and operated until 1972. The streets retain modest working class housing from the late Victorian, Edwardian and interwar eras. A number of the interwar houses retain their original front fences, which are also contributory (at 29-33 Bowler Street, 2 Carnarvon Street, 16 Loch Street and 5 Munro Street). The nineteenth-century infrastructure, including bluestone pitched laneways and bluestone kerb and channel to Bowler and Carnarvon streets, are also contributory. The Auburn Bowls Club site is contributory, particularly the bowling greens, while the built elements are all non-contributory.

The row of semi-detached brick dwellings at 13-19 Carnarvon Street and at 22-40 Bowler Street are Significant. The following properties are Non-contributory to the precinct: 20 & 21 Aberdeen Street; 2 & 19 Bowler Street; 14, 16, 18 and 20 Carnarvon Street; 23, 27, 28 (all units), 29, 31-33 and 35 Caroline Street; 56 & 58 Fletcher Street; 1, 6 & 9 Loch Street; and 1, 20, 21-23 & 33 Munro Street. The rest are Contributory.

How is it significant?

The Brickfields Environs Precinct is of local historical, architectural and social significance to the City of Boroondara.

Why is it significant?

The Brickfields Environs Precinct is of historical significance as tangible evidence of the influence of both public transport and employment centres on the construction of housing in Hawthorn East. As noted in the advertisements for the Symonds' Paddock subdivision, the nearby tram terminus, at the corner of Auburn and Riversdale roads, was a drawcard for new residents. The Hawthorn Brickworks, which operated from 1883 until 1972, also drew residents who were employed at the brickworks. The resultant housing stock housed many working-class residents when built, such as brickmakers, carters, laborers, die pinkers, painters, blacksmiths, coach builders and strikers, with the allotments and houses smaller and more modest than the Hawthorn East standard. (Criterion A)



The Brickfields Environs Precinct is significant as a collection of houses that illustrate typical working-class housing from the late Victorian period until World War II. The more modest finances of the original occupiers are visible in the small allotment sizes – leading to a very high proportion of single-fronted houses and timber-framed houses of all eras, as well as many semi-detached dwellings. The predominant style in the late nineteenth century and the first years of the twentieth century was the Italianate. These houses display characteristic elements such as low-pitched hipped roofs, chimneys with a rendered cornice, bracketed eaves, front verandahs with chamfered posts or Corinthian columns and cast-iron ornament, double-hung sash windows often with sidelights, and four-panelled front doors. Some of the most elaborately decorated houses of this era are Augustus Andrew Fritsch's pair of semi-detached polychrome brick houses at 13-19 Carnarvon Street, which feature highly ornamented front parapets. The Edwardian/Federation houses, both single-fronted and double-fronted, are recognisable by their half-timbered front gables and/or high hipped roofs with corbelled brick chimneys. Those brick houses shift from the Victorian brown brick to red brick. The most striking group from this era are the brick semi-detached row at 22-40 Bowler Street, which are massed to look like asymmetrical Queen Anne villas, and have unusual details such as corner windows. Interwar houses in the precinct occur in large clusters as well as single examples at the edges. Those of the 1920s are California Bungalows, almost all of them built of timber, one of which retains an original post and woven wire fence. They have gabled roofs (front-facing or transverse) with gabled front porches supported on tapered piers or paired posts on a pier. An unusual row of late 1930s double-fronted semi-detached timber houses survives on Carnarvon Street. One of the most common styles of the late 1930s Old English or Tudor Revival is well represented in the precinct. These houses all have characteristic vergeless gables with corbelled eaves, and are built of face brick on its own or paired with textured render. The fashion to mass semi-detached pairs to look like a single house continues in this period. A number of the 1930s houses retain their original front fences, usually of masonry to match the house. The houses are enhanced by the retention of the original nineteenth-century street infrastructure, including bluestone pitched laneways and kerb and channel. (Criterion D)

The Brickfields Environs Precinct is significant for its associations with the Fritsch and Holzer families, who owned the Hawthorn Brickworks and were influential in the development of housing around it. August Fritsch resided on the then Fritschs Road (now Bowler Street) in the 1870s, before the rest of the precinct was subdivided, and owned a number of rental properties by the 1890s. Another of the brickworks founders, Anton Holzer, owned land on Carnarvon Street and commissioned the son of his business partner, architect AA Fritsch, to design two pairs of semi-detached Boom-style cottages in 1890 (Nos. 13-19). AA Fritsch and Annie Holzer owned a number of properties on Loch Street and resided there in the 1890s. (Criterion H)

The Auburn Bowls Club, founded in 1886, is a Contributory place in the precinct for its social values as a very long and ongoing venue for community sporting and recreational activities, for both the women and men of this area, and for its associations with the Fritsch and Holzer families. Augustus Fritsch provided the land and John Holzer providing a mortgage for its purchase. During the interwar era, Mrs Gertrude Holzer was a many-time club and state champion, as well as vice-president and president of the Auburn Ladies' Bowling Club. (Criteria G & H)



Figure 1. Grading of significance of the Brickfields Environs Precinct. Source: Context Pty Ltd. 2019. Hawthorn East Heritage Gap Study, prepared for City of Boroondara.

Community nomination

A community nomination, dated 29 July 2021, was submitted to City of Boroondara in support of Roseberry Street, Hawthorn East being included on the Heritage Overlay. Specifically, the key points of the nomination include:

- A recommendation for Roseberry Street to be included as a precinct extension to Brickfields Environs Precinct (HO841 interim control, Amendment C308);
- Advice that Roseberry Street has historical significance (HERCON criteria A) as linked to the Hawthorn Brickworks as well as the theme of “working class houses”;
- Advice that Roseberry Street can be read as a Victorian workers cottage streetscape, with intact and contributory graded houses (HERCON criteria D and E); and
- Advice that some residents believe that there was one or two entrances to the brickworks from the street.



Summary of previous advice

Roseberry Street was considered by Natica Schmeder (Context Pty Ltd) for its potential to be included in the Brickfields Environs Precinct (HO841 interim control, Amendment C308) as well as its potential to be included on the Heritage Overlay in its own right. The streetscape had been identified during Stages 1 and 2 of the Hawthorn East Heritage Gap Study, however it was excluded on the following basis:

- The housing stock was found to be less intact on Roseberry Street than the precinct area that eventually became HO841, owing to infill development (recent and late twentieth century); and
- No places of potential individual significance were identified in the study.

Assessment

The following section outlines Extent Heritage’s assessment of the integrity and intactness of Roseberry Street, and therefore its potential for inclusion as either a precinct extension or its own precinct on the Heritage Overlay.



Figure 2. Grading of significance - Roseberry Street, Hawthorn East. Source: Extent Heritage Pty Ltd.

Street address	Place type	Style/era (based on architectural style in HERMES)	Intrusive upper floor addition?	Integrity (front portion)	Condition	Grading
Roseberry Street	Garage and semi-detached house	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Semi-detached house	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Fair	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Fair	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	Yes	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	Yes	Low	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	Yes	Moderate - Low	Poor	Contributory (front and fenestratic only)
Roseberry Street	Semi-detached cottage	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	Yes	Moderate	Good	Contributory
Roseberry Street	Semi-detached cottage	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Fair	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Path access to Fritsch Holzer Park	N/A	N/A	N/A	N/A	Non-contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Fair-Poor	Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
33 Roseberry Street	Residence	Victorian Period (1851-1901)	No	Low	Poor	Non-Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory

Street address	Place type	style in HERMES)	Upper floor addition?	(front portion)	Condition	Grading
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	New dwelling under construction	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Vacant block	N/A	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	Yes	High	Good	Contributory
Roseberry Street	Residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Postwar Period (1945-1965)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Vacant block	N/A	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Semi-detached cottage (faux Victorian era)	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Semi-detached cottage (faux Victorian era)	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Semi-detached cottage	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Semi-detached cottage	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Fair	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	Yes	High	Good	Contributory
Roseberry Street	New dwelling under construction	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Poor	Contributory

Street address	Place type	style in HERMES)	upper floor addition?	(front portion)	Condition	Grading
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Fair	Contributory
Roseberry Street	Semi-detached residence	Late Twentieth Century (c.1960-c.2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Fair	Contributory
Roseberry Street	Residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Good	Contributory
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	Moderate	Good	Contributory
Roseberry Street	Semi-detached residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Semi-detached residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Semi-detached residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Semi-detached residence	Contemporary (post 2000)	N/A	N/A	N/A	Non-Contributor
Roseberry Street	Cottage	Victorian Period (1851-1901)	No	High	Fair	Contributory



Conclusion and recommendations

It is the finding of this peer review that Roseberry Street does not meet the threshold for local significance in the City of Boroondara under the HERCON criteria, either as part of an extension of the Brickfields Environs Precinct (HO841 interim control, Amendment C308) or as a precinct in its own right. This advice is based on the following findings:

- As demonstrated by the grading of significance plan and associated grading table, thirty-eight (38) allotments of the ninety-two (92) assessed are non-contributory properties. These properties include postwar, late twentieth century and contemporary buildings, as well as some vacant blocks and a pedestrian path. With this number of non-contributory properties in mind, the nominated area has an overall intactness of 58% which is very low for a heritage precinct in the City of Boroondara (refer to Methodology above). In contrast, it is important to note that HO841 is highly intact with an intactness level of around 90%. Inclusion of Roseberry Street as a precinct extension would lower the overall significance of HO841, decreasing the overall integrity that the current heritage curtilage presents. Further, the streetscape does not have a high enough level of integrity to warrant inclusion on the Heritage Overlay as a precinct in its own right.
- Although archival records show that Roseberry Street was clearly linked to the Hawthorn Brickworks, and there is building stock remaining intact that reflects this historical period, the streetscape overall cannot be considered representative of, or important to an understanding of, this historical period owing to its low integrity. Specifically, the integrity of the street has impacted the ability of this area to meet the threshold for Criterion A.
- Of the contributory graded properties, seven (7) of these buildings have intrusive upper floor additions which, combined with the infill development, negatively impact upon the ability of Roseberry Street to present as a Victorian workers cottage streetscape.
- The community nomination notes that some residents believe that there were one or two entrances to the brickworks from the street, with specific reference to 28 Roseberry Street where there is a path leading to the park. No archival evidence is provided for this claim. Further, a review of the 1904 Melbourne Metropolitan Board of Works plan shows that 28 Roseberry Street was once occupied by a residence and outbuildings. This was likely demolished to make way for the pedestrian path when the park was established.

In addition, consideration was given to an extension of HO841 to include 3-11 and 2-20 Roseberry Street, which is a more intact section of the street. However, this is not recommended based on the following factors:

- This is a very small representative example of what was once Roseberry Street;
- A number of these buildings contain visible upper floor additions that reduce the ability of the group to present as workers cottages and therefore meet Criterion A, D and E; and
- HO841 incorporates whole streetscapes as opposed to small sections of streets.
- This type of building stock is already well represented in HO841.



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