

14 Bradford Avenue,
Kew

Expert Witness Statement to Panel
Amendment C294 to the Boroondara Planning Scheme

Bryce Raworth

Conservation Consultant and Architectural Historian

Prepared under instruction from ASK Planning Services

10 October 2019

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1.0 Introduction

1. This report was prepared under instructions from ASK Planning Services for Lan Nguyen and Hung Truong, the owners of the subject site. I have been asked to comment on the heritage considerations associated with Amendment C294 to the Boroondara Planning Scheme in relation to the property at 14 Bradford Avenue, Kew.
2. Amendment C294 of the Boroondara Planning Scheme seeks to implement the recommendations of the *City of Boroondara's Municipal-Wide Heritage Gap Study: Volume 4 Kew* to introduce heritage controls on a permanent basis to 20 individual places, 9 heritage precincts and to expand 6 existing heritage precincts. The amendment proposes to include the subject site as a contributory dwelling within the proposed 'Bradford Estate Precinct'. Under the proposed amendment no external paint, internal alteration or tree controls will apply. At present the precinct is subject to an interim heritage control which has an expiry date of March 2020.
3. By way of background, the Bradford Estate Precinct was surveyed by Context Pty Ltd in July 2017 and nominated for inclusion on the Heritage Overlay in the draft *City of Boroondara's Municipal-Wide Heritage Gap Study: Volume 4 Kew*, which was subject to preliminary public consultation between November and December 2017. Minutes for the Urban Planning Special Committee (UPSC hereafter) meeting held in April 2018 to consider the preliminary consultation noted that one dwelling in the proposed precinct, 3 Bradford Avenue, had been demolished and that 17 and 20 Bradford Avenue, 365 Cotham Road and 12 Stoke Avenue had permits to demolish.
4. In January 2019, the *City of Boroondara's Municipal-Wide Heritage Gap Study: Volume 4 Kew* went on exhibition as part of Amendment C294. By this time the four properties mentioned above had all been demolished. The exhibited Bradford Estate Precinct contained 20 properties; one existing individually significant building (1 Bradford Avenue), 9 non-contributory properties and 10 contributory buildings. The outcomes of exhibition were considered by the UPSC on 5 August 2019. Council officers by this time had recommended that the proposed Bradford Estate Precinct be abandoned as the lawful demolition of a number of properties had eroded the cohesiveness of the precinct and it was no longer considered to be of local heritage significance.
5. The UPSC however carried a motion which retains the Bradford Estate Precinct in Amendment C294 and reduces the precinct's boundary to only include 2-18 and 7-15 Bradford Avenue. With this proposed boundary change there are now 12

properties in the precinct, 7 contributory buildings on the east side and 3 on the west. There are also two non-contributory buildings on the west side (9 and 11).

6. This statement has been prepared with assistance from Sally Beaton of my office. The views expressed are my own.

2.0 Sources of Information

7. The analysis below draws upon an inspection of the exterior of the site and a review of the Amendment C294 documentation, which included a citation for the Bradford Estate Precinct, as included in the *City of Boroondara Municipal-Wide Heritage Gap Study: Volume 4 Kew*. It is noted that Council intend to rely upon an updated citation and statement of significance, however this information is due to be provided the same day expert evidence is due for circulation. This statement has therefore been prepared with consideration for the citation and statement of significance which was exhibited in January 2019.
8. Regard has been had for earlier heritage studies that referenced the subject site and/or its neighbours being the *Kew Conservation Study* (1988).
9. Reference has also been made to *Practice Note 1: Applying the Heritage Overlay (August 2018)*, and to the Heritage Victoria guidelines for assessment against criteria, the *Victorian Heritage Register Criteria and Threshold Guidelines* (reviewed and updated 2014).

3.0 Author Qualifications

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

4.0 Declaration

11. 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.



BRYCE RAWORTH

5.0 Description

12. A detailed history of the subdivision and development of Bradford Avenue has been prepared as part of the citation in the *City of Boroondara Municipal-Wide Heritage Gap Study: Volume 4 Kew*.
13. 14 Bradford Avenue is on the east side of Bradford Avenue. Occupying the property is an attic storey interwar dwelling constructed of clinker brick and roughcast render. The steeply pitched gable roof form is clad in terracotta tiles and punctuated with two tall rendered brick chimneys. The prominent gables are finished with wall hung shingles. To the north side of the facade is a single storey projecting bay with deep bracketed eaves and a terracotta tiled roof, with a set of curved French doors, at a slight setback to its south. An asphalt driveway runs along the southern property boundary toward the entrance porch. The property is enclosed by a tall brick fence, with a neatly manicured front garden.
14. To the north, 18 Bradford Avenue is a double storey interwar dwelling, finished with roughcast render and wall hung shingles. The pyramidal style hipped tiled roof is punctuated with four tall rendered chimneys. To the south, 10 Bradford Avenue is a single storey rendered interwar dwelling with a hipped tiled roof, which appears to have been rejuvenated recently. From the street two tall rendered chimneys are visible. This property is enclosed by a low roughcast rendered fence which is likely original.
15. Bradford Avenue is a quiet 'no through road', which runs in a north south direction from the north side of Cotham Road. As will be discussed through this report, the street contains some examples of typical interwar dwellings, interspersed with modern infill.



Figure 1 14 Bradford Avenue contains an attic storey interwar dwelling with a clinker brick and roughcast render finish.



Figure 2 2 Bradford Avenue contains a double storey apartment building constructed c.1940.



Figure 3 The northern side of 2 Bradford Avenue, with original garages to the rear of the property.



Figure 4 Occupying 4 Bradford Avenue is a double storey dwelling, with the upper level at a setback. The carport, while sympathetic to the design, is a later addition.



Figure 5 6 Bradford Avenue contains a double storey interwar dwelling.



Figure 6 8 Bradford Avenue is a single storey interwar dwelling with a rendered finish. The dwelling is set behind a tall solid brick fence with tall timber picket gates.



Figure 7 10 Bradford Avenue is a single storey interwar dwelling with a rendered finish. The tiled roof has been rejuvenated recently.



Figure 8 18 Bradford Avenue is a double storey interwar dwelling.



Figure 9 20 Bradford Avenue, at the northern end of the street, is a vacant property.



Figure 10 The northern end of Bradford Avenue provides garage access for properties which front Stoke avenue to the north.



Figure 11 19 Bradford Avenue contains modern infill.



Figure 12 Views toward the west side of Bradford Avenue.



Figure 13 Views toward 15 Bradford Avenue, a tall single storey interwar dwelling, and 17 Bradford Avenue, a modern double storey dwelling.



Figure 14 13 Bradford Avenue is a double storey interwar dwelling.



Figure 15 9 Bradford Avenue contains double storey dwelling of no heritage interest.



Figure 16 7 Bradford Avenue is an attic storey interwar dwelling, with a prominent carport in the front setback.



Figure 17 5 Bradford Avenue contains modern infill.



Figure 18 3 Bradford Avenue also contains modern infill.



Figure 19 1 Bradford Avenue is already subject to an individual Heritage Overlay, HO277.

6.0 Heritage Status

City of Boroondara

16. The precinct is subject to an interim heritage control, which at present expires March 2020. Amendment C294 to the Boroondara Planning Scheme proposes to implement the recommendations of the *City of Boroondara Municipal-Wide Heritage Gap Study: Volume 4 Kew* and to apply a permanent Heritage Overlay over the Bradford Estate Precinct, and to include the subject site, 14 Bradford Avenue as a contributory building.
17. No external paint controls, internal alteration controls or tree controls are proposed.

Heritage Victoria

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

National Trust of Australia (Victoria)

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

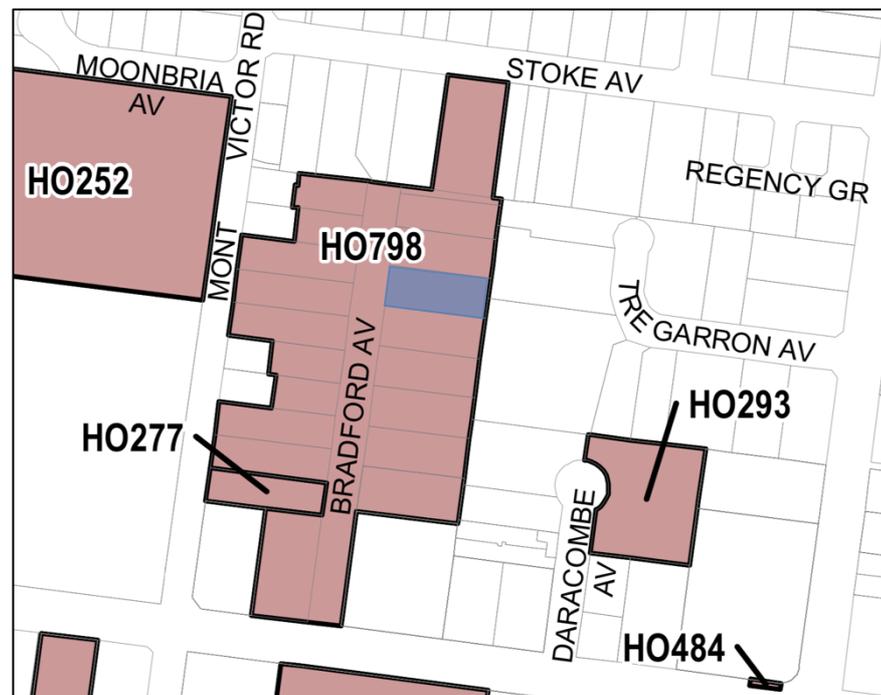


Figure 20 The extent of the proposed Bradford Estate Precinct, as exhibited through Amendment C294. The subject site has been shaded blue.

20. The documents exhibited by the City of Boroondara in support of Amendment C294 include a citation that contained a statement of significance for the proposed precinct, which is reproduced below.
21. It is understood however that the City of Boroondara is intending to rely upon an updated citation and statement of significance for a truncated version of the precinct.

What is significant?

The Bradford Estate Precinct, which comprises 1-19 and 2-20 Bradford Avenue, 365 Cotham Road, and 12 Stoke Avenue, Kew, is significant. The Bradford Estate was subdivided in 1916. The Precinct comprises a collection of gracious interwar houses of high-quality design, some of particularly impressive appearance and substantial size, on generous allotments. A block of cream brick flats built by 1942 to an unusual design occupies 2 Bradford Avenue. The houses were all built between 1919 and c.1930.

No. 1 Bradford Avenue is individually significant. This significance is already recognised by its individual listing in the Heritage Overlay (HO277).

Places of Contributory significance are listed in the attached schedule.

Original front fences at 2, 10, and 18 Bradford Avenue are contributory. The original garages at 2 Bradford Avenue are also contributory. Non-original alterations and additions to the houses are not significant, including the second storey additions, non-original garages and carports, and high brick front fences. Some of the front fences are sympathetic to the architectural style of the houses, but are not significant.

How is it significant?

The Bradford Avenue Precinct is of local historical and architectural significance to the City of Boroondara.

Why is it significant?

Historically, the Bradford Estate Precinct is significant for the evidence it provides of the pattern of settlement in this part of Kew during the early interwar period, which comprised subdivisions on the grounds of larger estates. The scale and high quality design of the houses and the flat building, and the 'respectability' epitomised by their architectural styles and associated elements, remain as important evidence of the strength of Kew's development during the interwar period. (Criterion A)

Architecturally, the Bradford Estate Precinct, Kew is significant for its concentration of gracious houses on generous allotments of high quality design and with a high level of integrity, comparable to other Precincts in Kew. Subdivided in 1916 and built largely during the 1920s, the Precinct features predominantly interwar building stock, with houses designed in styles that were fashionable during this time, including the Federation Arts and Crafts architectural style, which continued its popularity into the interwar period, and the interwar Mediterranean and Bungalow styles. The large Federation Arts and Crafts house at 12 Stoke Avenue, although not of individual significance, is of impressive appearance, and was designed by architects Gawler and Drummond. The high quality design of many of the other houses in the precinct suggests architects or designer-builders may also have built them. (Criterion D)

The architectural significance of the Precinct is enhanced by the architectural quality and integrity of many of the contributory places. Many of the houses retain original built features, including early and original front fences (at 2, 10, and 18 Bradford Avenue) and original garages at 2 Bradford Avenue which were an integral component of the original design for the flats. (Criterion D)

22. In terms of background to the present proposal for a heritage precinct to this street, it is of note that the buildings within Bradford Avenue have been surveyed as part of at least one previous heritage study undertaken on behalf of Council. In the *Kew Conservation Study* (Sanderson 1988), most of the original dwellings within Bradford Avenue were graded C (with the exception of 1 Bradford Avenue which was graded B). C grade buildings were defined in the *Kew Conservation Study* as follows:

Grade C Places: Places that contribute to the architectural or historical character and cohesiveness of the City of Kew. Grade C structures are, in the main, severely altered examples of typical buildings types.

23. It was not suggested that the C grade buildings warranted a Heritage Overlay in their own right at that time.
24. The comparative analysis referred to in the exhibited citation include, HO142, the Barrington Avenue, Precinct, Kew and HO143, the Barry Street Precinct, Kew. The authors also refer to the Goldthorns Hill and Environs Precinct and the Thornton Estate Precinct, however these two are proposed precincts, rather than existing.

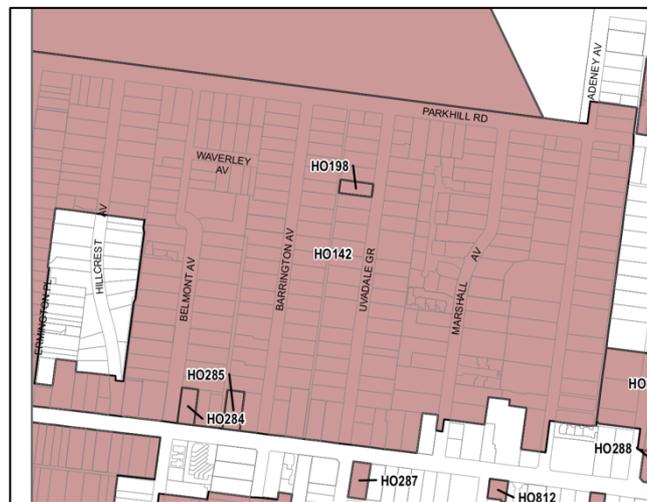


Figure 21 Extract of HO142 Barrington Avenue Precinct.



Figure 22 HO142 Barrington Avenue Precinct, Kew, heritage gradings.

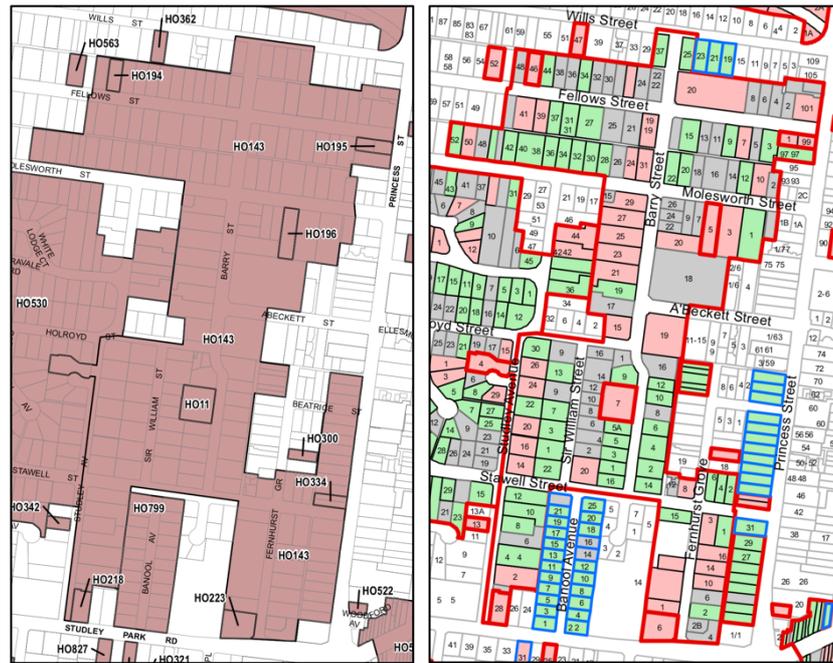


Figure 23 HO143 Barry Street Precinct, heritage overlay left, heritage gradings at right.

25. As the above diagrams illustrate, the Barrington Avenue and Barry Street precincts are larger in scale and are generally more impressive as a result of their extent. These precincts also have a number of significant graded buildings, which the propose Bradford Avenue precinct does not.
26. In the discussion of ‘Comparative Analysis’, as set out in section 2.3.4 in the *City of Boroondara Municipal-Wide Heritage Gap Study: Volume 4 Kew*, the threshold or benchmark measure that was established by Context in their work was that:
- When the place or precinct under assessment was considered to be of equal or better quality than the ‘benchmark(s)’ it was judged to meet the threshold of local significance and considered worthy of inclusion in the Boroondara Heritage Overlay.*
27. In my view it is not possible to come to this view with regard the comparisons above. That is, the proposed precinct is not of equal or better quality than the benchmarks. For example, in terms of the Barry Street Precinct, it is evident that while the precinct has a number of non-contributory buildings, the precinct also has a relatively high proportion of significant graded, Victorian and Federation era buildings, many designed by prominent Melbourne architects. By contrast the proposed Bradford Avenue Precinct, in both its exhibited and proposed truncated form, is a small interwar precinct with only a few proposed contributory graded buildings of relatively poor interest and heritage quality.
28. In its comparison with the Barry Street and the Barrington Avenue Precinct, the exhibited citation makes the following comments

Some of the houses were architect designed, others have the appearance of being built by designer-builders. In this sense, the Bradford Estate Precinct is similar to the Barrington Avenue Precinct,

Kew (HO142) and the Barry Street Precinct, Kew (HO143), both of which have unusual concentrations of buildings of high quality design and a high level of integrity.

29. Even in the proposed truncated form, this comparison should be seen as unfavourable. The comparative analysis states that some of the houses were architect designed, or *appear to have been built by designer builders*, however the citation only provides evidence that 12 Stoke Avenue (which has subsequently been demolished) was architect designed.
30. In summary, the benchmarking that has been undertaken should be seen to demonstrate that the exhibited precinct is not worthy of listing under the Heritage Overlay, insofar as it is inferior to precincts that are already identified and protected in character, appearance and significance.

7.0 Analysis

31. As mentioned in Section 1, the Bradford Estate Precinct was surveyed by Context Pty Ltd in July 2017 and nominated for inclusion on the Heritage Overlay in the draft *City of Boroondara's Municipal-Wide Heritage Gap Study: Volume 4 Kew*, which was subject to preliminary public consultation between November and December 2017. It was noted in the minutes for the UPSC meeting held in April 2018 to consider the preliminary consultation that one of the dwellings in the proposed precinct, 3 Bradford Avenue, had been demolished and that 17 and 20 Bradford Avenue, 365 Cotham Road and 12 Stoke Avenue had permits to demolish.
32. In January 2019, the *City of Boroondara's Municipal-Wide Heritage Gap Study: Volume 4 Kew* went on exhibition. By this time the four properties mentioned above had all been demolished. The exhibited Bradford Estate Precinct contained 20 properties; one existing individually significant building (1 Bradford Avenue), 9 non-contributory properties and 10 contributory buildings. The outcomes of exhibition were considered by the UPSC on 5 August 2019. Council officers by this time had recommended that the proposed Bradford Estate Precinct be abandoned as the lawful demolition of a number of properties had eroded the cohesiveness of the precinct and it was no longer considered to be of local heritage significance.
33. The UPSC however carried a motion which retains the Bradford Estate Precinct in Amendment C294 and reduces the precinct's boundary to only include 2-18 and 7-15 Bradford Avenue. With the proposed boundary change the proposed precinct now includes 12 properties, 7 contributory buildings on the east side and 3 on the west. There are also two non-contributory buildings on the west side (9 and 11).
34. I agree with Council's officer's recommendation that the proposed Bradford Estate precinct should be abandoned.
35. The recognised criteria for the assessment of heritage values of a heritage place, as set out in *Practice Note 1: Applying the Heritage Overlay (August 2018)*, are as follows:

Criterion A: Importance to the course or pattern of our cultural or natural history (historical significance).

Criterion B: Possession of uncommon rare or endangered aspects of our cultural or natural history (rarity).

Criterion C: Potential to yield information that will contribute to an understanding of our cultural or natural history (research potential).

Criterion D: Importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness).

Criterion E: Importance in exhibiting particular aesthetic characteristics (aesthetic significance).

Criterion F: Importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance).

Criterion G: Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to

Indigenous peoples as part of their continuing and developing cultural traditions (social significance).

Criterion H: Special association with the life or works of a person, or group of persons, of importance in our -history (associative significance).

36. To be identified as a place of local significance sufficient to warrant application of the Heritage Overlay, a place should meet one or more of these criteria to a degree that meets a threshold of local significance. This is to say, the criteria in question should be met not just in a simple or generic manner, but to a degree that is better than many or most other examples at a local level, or to a degree that is comparable to other examples that are subject to the Heritage Overlay.
37. While it is acknowledged that the exhibited version of the Bradford Estate Precinct has different boundaries to what is to be put forward to the Panel, the case for recommending a Heritage Overlay Precinct was predicated on the view that the precinct is of historical and architectural significance to the City of Boroondara (Criteria A & D).
38. The proposed Bradford Estate Precinct, in both its exhibited form and its proposed truncated form has only very limited significance to the City of Boroondara in terms of its historical and architectural significance.
39. While the proposed precinct can be seen to possess some relatively generic degree of local historical interest (Criterion A) as providing evidence of the pattern of settlement in this part of Kew during the early interwar period, it does not meet a threshold of historical significance at a local level that in itself warrants a precinct.
40. Bradford Avenue was reportedly subdivided in 1916, and while the subdivision of larger estates is of some degree of local historical interest, the subdivision of this street is not in any obvious sense to be more highly valued than any other estate subdivision that occurred through the early 20th century when larger farming properties were sold and subdivided to accommodate growing interest in the area for residential use. Furthermore, the proposed truncated version of the precinct has had some impact on the historical significance claimed for the precinct.
41. With regards to architectural values, and the issue of representativeness that is established under Criterion D, the statement of significance, as exhibited states *‘Subdivided in 1916 and built largely during the 1920s, the precinct features predominantly interwar building stock, with houses designed in styles that were fashionable during this time, including Federation Arts and Crafts architectural style, which continued its popularity into the interwar period, and the interwar Mediterranean and Bungalow Styles. The large Federation Arts and Crafts house at 12 Stoke Avenue, although not of individual significance, is of impressive appearance, and was designed by architects Gawler and Drummond. The high quality design of many of the other houses in the precinct suggests architects or designer- builders may also have built them’.*
42. Council officer’s in their recommendations to the UPSC stated that since several of the houses within the precinct had been demolished, the mixture of house types and interwar styles, particularly on the east side of Bradford Avenue is typical of

interwar development in Boroondara and do not stand out to the extent that other examples of small precincts already protected through the Heritage Overlay do.

43. I concur with this statement; interwar dwellings are well represented throughout the Boroondara municipality and the proposed contributory buildings are broadly typical building types which contribute little that is unusual or unknown to an understanding of architectural forms within the area during the interwar period.
44. Boroondara has two of the finest interwar heritage precincts in the metropolitan area, being the Golf Links Estate and the Reid Estate, and the proposed precinct, particularly in its truncated form, compares very poorly against these two examples, as well as other examples. It cannot be seen to meet a threshold of local significance as a locally important example of interwar development when other examples are taken into account as benchmarks.
45. Given the physical changes within the precinct between preliminary consultation and exhibition, Council's heritage advisor re-visited Bradford Avenue in June 2019 to consider whether the application of the Heritage Overlay to the precinct or a smaller revised extent was justified.
46. Council's heritage advisor found that the west side of the street had been impacted by demolitions and that the three remaining contributory buildings (7, 13 and 15) had been subject to alterations, with 7 having a large dormer addition to the north side, and large front carport, 13 having two dormer windows added to the front façade and 15 have a dormer addition to the north side.
47. Further to this, Council officers state in their recommendations that it was investigated if there was justification for the east side of the street (the more intact side) to be included as a small precinct of local significance, as there is no rule on the size of a precinct if it is determined to be of local significance.
48. In determining whether a Heritage Overlay should be applied to the east side of the street, it needed to be established whether the east side of the street reached a threshold level, and also how it compared to other places within the suburb (or municipality).
49. Council's heritage advisor undertook a comparative assessment against the following precincts within the City of Boroondara, Grange Avenue Residential Precinct, Canterbury (HO590), Lower Burke Road Precinct, Glen Iris (HO154) and Howard Street Precinct, Kew (HO528). The heritage gradings maps and statements of significance for these precincts are as follows

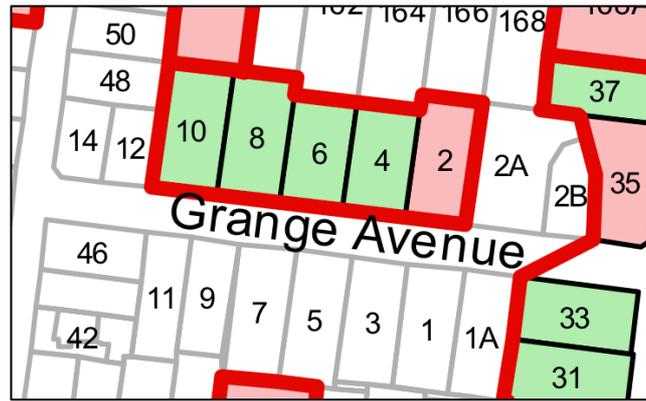


Figure 24 HO590 Grange Avenue Residential Precinct, Canterbury.

50. The Statement of Significance for HO590 Grange Avenue Residential Precinct, Canterbury, as found in *Heritage Policy – Statements of Significance* is reproduced as follows:

The Grange Avenue Residential Precinct, Canterbury, is an area of cultural heritage significance for the following reasons:

- *The Grange Avenue Precinct is of historic significance as a subdivision that is representative of small-scale interwar subdivisions in the former City of Camberwell, which saw the breakup of large estates, such as ‘The Grange’, into middle-class residential areas including Grange Avenue and View Street. The substantial nature and high quality of the design of the houses at 2-10 Grange Avenue exemplify the quintessential middle-class interwar character for which suburbs in the former City of Camberwell are celebrated.*
- *The Grange Avenue Residential Precinct is of aesthetic significance for the strong and visually cohesive streetscape created by the row of houses which share a common style, setback, scale, major roof forms, materials and decorative details. Paired with their overall visual unity, the houses are individually and skillfully designed variations on a theme, expressed by different combinations of secondary roof gables and dormers, verandah supports and leadlight windows. They are also high quality interwar houses, at least one of architect design, which are substantial for the area, and good examples of the Arts & Crafts attic-style bungalow. They are generally highly intact to their period of construction, and have been well maintained. They are enhanced by the mature Plane street trees on the wide nature strip.*
- *No 2 Grange Avenue is particularly distinguished by its superior level of detail and finishes, particularly seen in the complex massing of the front gable, the gabled ‘roof’ above the front bay window, and the fine brickwork of the arched brick porch entry. It demonstrates the evolution of architect Arthur Bidgway’s high-quality middle-class houses from the Victorian and Edwardian villas found in Port Melbourne, to this very up-to-date interpretation of the Arts and Crafts style with California Bungalow elements in 1921.*

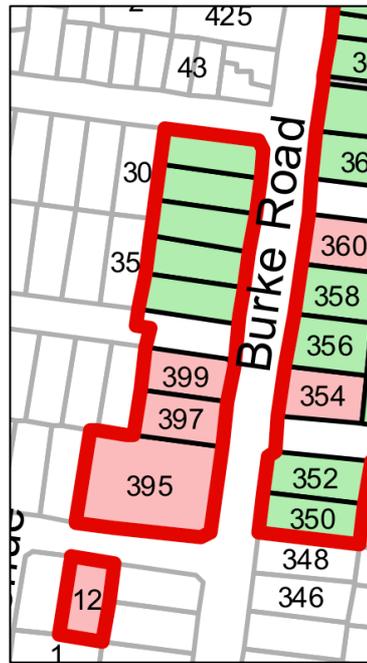


Figure 25 HO154 Lower Burke Road Precinct, Glen Iris

51. The Statement of Significance for HO154 Lower Burke Road Precinct, Glen Iris, as found in *Heritage Policy – Statements of Significance* is reproduced as follows:

The Lower Burke Road Precinct, Glen Iris, is an area of heritage significance for the following reasons:

- *The place contains Hawthorn’s most intact group of interwar houses, adopting a variety of styles, many of which retain associated fences and gardens.*
- *The place is of interest for the prominent and slightly elevated siting of the houses.*

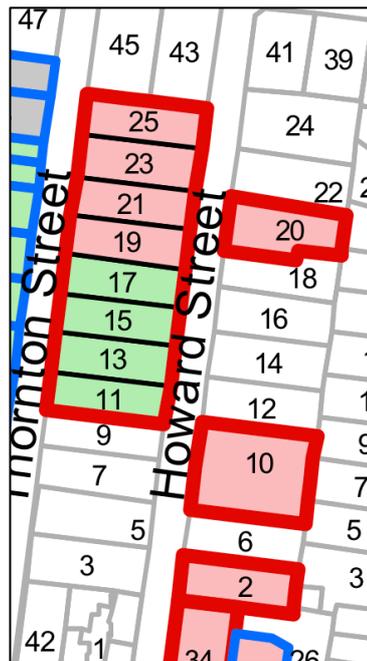


Figure 26 HO528 Howard Street Precinct, Kew

52. The Statement of Significance for HO528 Howard Street Precinct, Kew as found in *Heritage Policy – Statements of Significance* is reproduced as follows:

The Howard Street Precinct, Kew, is an area of cultural heritage significance for the following reasons:

- *Historically, the Howard Street precinct is important for its demonstration of the continuing pattern of subdivision of the formerly large estates on the south side of Studley Park Road, Kew during the interwar years, and as a highly readable 'essay' in the Old English domestic style of architecture. The latter style was much favoured in this general period in affluent pockets of Bororoondara. The houses in the precinct were also constructed in unusually quick succession over a five year period, a concentrated burst of building activity expressing this popular building style.*
 - *Architecturally, the Howard Street precinct is significant as an intact precinct in which seven of the eight original property owners commissioned houses adopting the Old English style, with individual dwellings providing evidence of differing but still related architectural approaches. These range from the elaborate full-blown 'Gingerbread House' attic style of 19 Howard Street; to variations employing decorative brickwork and dramatic pitched roof forms, such as 21, 23 and 25 Howard Street; and also to those with more traditional floor plans and forms but utilising half timbering, clinker brickwork and decorative stone trim to imbue the residences with an Old English flavour, such as with 11, 13 and 17 Howard Street. While the building at 15 Howard Street adopts a Modern style in rendered brick, the siting and scale are consistent with those in the Old English style.*
 - *The aesthetic significance of the precinct is further enhanced by the uniform property street setbacks and large landscaped front gardens, several of which are original or of long-standing planting and landscaping. The retention of original low brick and/or stone front fences adds to this aspect of significance.*
53. Council's heritage consultant concluded that it was clear that these precincts, while small, display a high degree of cohesion that makes them special in their context.
54. I agree with this statement, a truncated version of the Bradford Avenue Precinct, either in the form proposed by Council's UPSC or the east side of the street by itself does not benefit from a degree of strong architectural cohesion which would make it stand out with regards to its architectural or aesthetic qualities.
55. The dwellings on the east side of the street were separated by Council's heritage advisor into three distinct groups, Arts and Craft style bungalows (4, 6, 14 & 18), Mediterranean Revival villas (8 and 10), and a cream brick apartment building, which is distinct in its materiality, massing and details to the other dwellings (2). In addition, dwellings at 7, 13 and 15 could be broadly considered as Arts and Craft style bungalows.
56. As stated above, these dwellings possess characteristics which identify them as of interwar construction, however their typologies are mixed, and details plain and generic. The existing interwar dwellings may have been considered a contributory part of the larger proposed interwar precinct, if there were more architecturally interesting buildings surrounding them, however the lack of architectural interest and cohesion means the remaining interwar dwellings within the street do not meet

a threshold level of significance to warrant protection through the Heritage Overlay.

8.0 Conclusion

57. Having regard for all the above, I agree with Council officer's that the proposed heritage overlay for Bradford Avenue, in its exhibited form should be abandoned.
58. Furthermore, the proposed truncated precinct at 7-15 and 2-18 Bradford Avenue is not of sufficient integrity nor sufficient historic or architectural significance to warrant a precinct control as part of Amendment C294 to the Boroondara Planning Scheme.

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

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

From 2004-2011 Raworth was a member of the Official Establishments Trust, which advises on the conservation and improvement of Admiralty House and Kirribilli House in Sydney and Government House and The Lodge in Canberra.

As a member of the former Historic Buildings Council in Victoria, sitting on the Council's permit, planning and community relations committees, Raworth has been involved with the registration and permit processes for many registered historic buildings. In 1996 he was appointed an alternate member of the new Heritage Council, the successor the Historic Buildings Council, and in 1998 was made a full member.

At present he provides regular advice to architects and private owners on technical, architectural and planning issues relative to the conservation and adaptation of historic buildings, and is occasionally called upon to provide expert advice before the VCAT. He is currently the conservation consultant for the cities of Kingston, Frankston and Stonnington.

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

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

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

BRYCE RAWORTH

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