

Expert Witness Statement by:
Peter Andrew Barrett

Registered Address
Level 31
120 Collins Street
Melbourne

For:

Planning Panels Victoria
Hearing

With regard to a proposal as part of Amendment C201glen of the *Glen Eira Planning Scheme* to include a shop at 430 Neerim Road, Murrumbeena as a contributory place within the proposed Murrumbeena Village Precinct heritage overlay.

Prepared for:
Vivace Property Group Pty Ltd

Instructions received from:
Best Hooper Lawyers

1 May 2020

PREAMBLE

Council engaged Built Heritage Pty Ltd to assess the study area, hereon referred to as the 'Murrumbeena Village Precinct'. This is a commercial area, its nucleus being the Murrumbeena Railway Station. Commercial buildings extend along parts of Neerim and Murrumbeena Roads, in the environs of the railway station.

Built Heritage Pty Ltd determined that the Murrumbeena Village Precinct met the threshold for local significance in Criterion A (Historic Significance) and Criterion E (Aesthetic Significance). This was formalised in a citation prepared by Built Heritage Pty Ltd, titled 'Murrumbeena Village Precinct', which contains a statement of significance for the heritage overlay.

Vivace Property Group Pty Ltd, the owner of a site at 430-434 Neerim Road, Murrumbeena has commissioned this expert witness statement. It is in light of a proposal by the City of Glen Eira to include a portion of this site (No 430) as a contributory place within the proposed Murrumbeena Village Precinct, as part of Amendment C201glen of the *Glen Eira Planning Scheme*.

An interim heritage overlay has been applied to the entire site – HO187 430-434 Neerim Road, Murrumbeena. This interim heritage overlay will expire 31 March 2021.

The purpose of this expert witness statement is to assist Planning Panels Victoria in a hearing to assess Amendment C201glen of the *Glen Eira Planning Scheme*, and the contributory grading of the shop at 430 Neerim Road, Murrumbeena (hereon referred to as the 'subject site') to this proposed heritage precinct.

My qualifications and experience in the field of architectural history and heritage conservation are outlined below.

QUALIFICATIONS & EXPERIENCE

I am a qualified architectural historian and heritage consultant. I have a Masters Degree in Architectural History and Conservation from the University of Melbourne. I also have a qualification in Architectural Technology from the Royal Melbourne Institute of Technology (RMIT). In 2017, I completed a program in urban design and Placemaking at the Project for Public Spaces in New York.

I am a member of Australia ICOMOS (International Council on Monuments and Sites), and I adhere to its *Burra Charter* (2013). I am a member of the Pacific Heritage Reference Group of Australia ICOMOS, whose purpose is to provide advice to the President and the Executive Committee of Australia ICOMOS on cultural heritage matters in the Pacific region. Other affiliations that I have are membership of the Australian Architecture Association, and the Society of Architectural Historians of Australia and New Zealand.

I have been involved in a range of heritage projects within Australia including heritage studies, conservation management plans, and heritage assessments of development proposals of residential, commercial, industrial and public buildings.

I am a heritage advisor to the City of Kingston, Alpine Shire and to Latrobe City Council. I am also a member of a panel of consultants (heritage) for the Moreland City Council. I have undertaken heritage assessments and heritage studies for municipalities within Victoria. These Councils include Port Phillip, Glenelg, Wyndham, Frankston City, Hobsons Bay and Maroondah.

I have appeared as an expert witness on heritage matters at Planning Panel Hearings for matters before the Minister for Planning, the Heritage Council of Victoria, the Victorian Civil & Administrative Tribunal, and in other forums.

I have worked on heritage projects in New South Wales and Tasmania. I have also been involved in heritage projects in the United States of America. In California I worked on heritage impact assessments and cultural resources studies of districts of Los Angeles and San Francisco. In 2004, I received a grant from Austrade for the provision of heritage services to the United States.

I have written published architectural histories for the Public Record Office Victoria, the City Museum and for the *Melbourne Design Guide*. I have also been commissioned to write histories of commercial and residential buildings in Melbourne. I am the author of an online architectural history and heritage social media page. I have also been involved with architectural exhibitions, including guest curator of *The Impermanent City: the rise and fall of Melbourne's skyline* at the City Museum.

The University of Melbourne, RMIT, CAE and other educational institutions have engaged me as a tutor and lecturer in architectural history and design. I have also been retained by RMIT to assess postgraduate-level architectural theses. Educational organizations, as well as heritage groups and the media, ask me to speak, or to comment, on architectural history and heritage matters. In 2011, I was invited to speak at the California Preservation Foundation conference in Santa Monica.

METHODOLOGY

This heritage assessment is prepared with regard to the *Australia ICOMOS Burra Charter, 2013*, which is the standard of heritage practice in Australia.

My assessment is prepared with regard to the Department of Environment, Land, Water and Planning, Practice Note 1, 'Applying the Heritage Overlay', August 2018. Within that document are the recognised HERCON criteria used for the assessment of the heritage value of a place.

This assessment is based, in part, on inspections of the study area, the Murrumbeena Village Precinct, and its immediate environs. This was undertaken when I prepared my initial comments about the proposed precinct in a Memorandum of Heritage Advice dated 25 September 2019; and again, on 27 April 2020, when preparing this expert witness statement.

I have reviewed the citation titled 'Murrumbeena Village Precinct', which forms the basis of this proposed heritage overlay. It is contained with the 'City of Glen Eira Heritage Review 2020' prepared by Built Heritage Pty Ltd. I understand the shop at No 430 was identified in the earlier 'Post-war and Hidden Gems Review' to be of potential heritage value.

I have also reviewed the Andrew Ward, 'City of Glen Eira Heritage Management Plan', 1996, which includes an environmental history.¹ An addendum to this study prepared in 2014, refers to additional heritage sites in Caulfield North.²

During the course of preparing this expert witness statement I have undertaken research into the history of this study area, and the subject site, using primary and secondary sources. Where primary and secondary sources are relied upon in this expert witness statement I have referenced them in footnotes.

SITE & ENVIRONS

The proposed Murrumbeena Village Precinct straddles the Melbourne to Gippsland Railway Line in the environs of the Murrumbeena Railway Station, and has effectively a north and south portion. The railway line and the platforms of the station were recently elevated as part of the Sky Rail project undertaken by the State Government as part of their program of removal of level crossings.

1 Andrew Ward, City of Glen Eira Heritage Management Plan, volume 1.
2 City of Glen Eira, 'Addendum to the Glen Eira Heritage Management Plan (Revised) 2014.

Much of the history has been documented in the citation, and need not to be recounted here at any length. Suffice to say, in Post-European settlement two main phases of development transformed Murrumbeena from a rural settlement on the periphery of Melbourne, to a suburb of the city. The initial phase occurred in the late-nineteenth century as part of the Land Boom, triggered by the completion of the Melbourne to Gippsland Railway Line, and the opening of a station at Murrumbeena in 1879.³ The close proximity to earlier and more established suburbs such as Caulfield, and Malvern, had the suburb marketed as an expansion of these and a desirable area to build.⁴

The second, and more significant phase, is associated with the electrification of the suburban railway system from 1919. Electrification reduced travelling times to the city by up to 20%, and allowed these settlements on the periphery of the metropolis to become dormitory suburbs. Much of the early fabric within Murrumbeena is from the inter-war period, and part of this second phase of development.

The building stock within the Murrumbeena Village Precinct is predominantly single and two-storey commercial buildings of the inter-war period. Some earlier and later examples of commercial and residential buildings are interspersed within this inter-war built form. The pre-World War II building stock, which Built Heritage note to be of heritage value, have varying levels of aesthetic and historic values, and varying degrees of intactness.

Figure 1: The recently completed Sky Rail project has included a square in Murrumbeena Village Shopping Centre. The buildings on the subject site (No's 430-434) are visible at rear (Photograph: April 2020)



3 Rick Anderson, *Stopping All Stations*, p 173.
4 Auction Notice for the Murrumbeena Reserve Estate, c1880s, held by the State Library of Victoria.

Figure 2: The shops
on the subject site,
looking northeast
from the
intersection of
Murrumbeena and
Neerim Roads.
(Photograph: April
2020)



Figure 3:
Murrumbeena Road
frontage of the
subject site, looking
southeast from the
intersection of
Melbourne Street
(Photograph: April
2020)



Figure 4: Melbourne
Street frontage of
the subject site
(Photograph: April
2020)



The subject site is situated on the northeast corner of Neerim and Murrumbeena Roads, on the portion of Neerim Road north of the Melbourne to Gippsland Railway Line. The site has a rear boundary that extends along the south side of Melbourne Street. Built upon the subject site is a two-storey brick shop (No 430), which was part of a pair of two-storey shops, the other in this pair (No 432) has been demolished. Two single-storey shops now occupy the east portion of the site (No 432-434).

Historical sources indicate that two two-storey shops (No 430 and 432) were built sometime after 1909. The rate book information that has been submitted by Built Heritage conflicts with some other sources. An auction notice of 1909 (see figure 4),⁵ shows only one shop at this corner. A photograph c1915 and *Sands & McDougall Directories* entries, show the two shops had been built by this time.⁶ The two shops are shown on an MMBW Detail Plan of 1918.⁷ The other shop (No 434) was built during the inter-war period.⁸ (see other comments in the Analysis section).

-
- 5 Auction Notice, 'Omama Estate', dated 9 October 1909, held by the State Library of Victoria.
6 Sands & McDougall Directories, 1910 and 1915.
7 MMBW Detail Plan No 2562, Municipality of Caulfield, dated 1918, held by the State Library of Victoria.
8 Sands & McDougall Directories, 1925 and 1930.

Figure 5: A portion of an auction notice for the Omama Estate of 1909. It shows only one shop at this corner. (Source of plan: State Library of Victoria)



Figure 6: This photograph of c1915 shows the two two-storey shops completed at this time. (Photograph: April 2020)



Various alterations and additions have impacted upon the character of the site at 430-434 Neerim Road. The most noticeable is the removal of one two-storey shop (No 432), and a rear two-storey Post-war red brick addition to the other shop (No 430), which has distorted its original form and given the shop an elongated mass along the Murrumbeena Road frontage. Other works that have impacted upon the character of the shops include the fitting of a canopy in the Post-war period to unify the Neerim Road facades, and the removal and/or alteration of fenestration on both the Murrumbeena and Neerim Roads elevations.

ANALYSIS

The removal in recent years of the level crossing in Murrumbeena Road, and the elevation of the railway line and station, has had a significant impact upon the character of the Murrumbeena Village shopping centre. From an urban design perspective, aspects of this change have been good, lifting the character of the shopping centre with the creation of a new public space. This has provided the local community with a village square of sorts, a facility residents have pushed for from the 1920s; activating land previously used for railway purposes, at what is the core of this shopping centre.

The shopping centre is defined as having two parts, one south of the railway line, the other to its north. This division was created in the nineteenth century with the realignment of Neerim Road to transverse the Melbourne to Gippsland railway line when opened in 1879. It is fair to say commercial development has radiated from the Murrumbeena Railway Station, but most of this built form was not triggered by the railway's opening, but its electrification in the 1920s that allowed for Murrumbeena to become a dormitory suburb of Melbourne. Much of the shopping centre's built form today is reflective of this inter-war phase of development.

Murrumbeena Village south of the railway line retains a higher proportion of heritage fabric than the north. Contained within this south portion are what the citation identifies to be 'stand-out' buildings in the shopping centre. These are a former branch of the State Savings Bank of Victoria, and Wardrop's Buildings at the northwest corner of Murrumbeena and Neerim Roads. Other buildings that complement this pair include a row of single-storey shops to the west of the two-storey Wardrop's Buildings in Neerim Road, and opposite at the south-west corner a two-storey shop with a distinct curved upper-bay with a shingled hood. A modest, yet notable complement to this intersection, is the single-storey former store of Moran & Cato, a grocery store chain ubiquitous in the suburbs of Melbourne up to the mid-twentieth century.

Figure 7:
Murrumbeena
Road, prior to the
removal of its level
crossing in recent
years (Photograph:
Eddie Jim, Domain,
17 April 2018)



In contrast, the portion of the shopping centre north of the railway line is less notable in terms of heritage buildings. This is demonstrated in the map in the citation that has been prepared for this precinct, which shows around 40% of the building stock north of the railway line is non-contributory. This is a high-level of non-contributory fabric for a heritage overlay.

The proposed precinct boundaries of this heritage overlay are somewhat arbitrary, when compared with Council signage for the Murrumbeena Village, and/or commercial/mixed use zones within the *Glen Eira Planning Scheme*. These show the village and commercial/mixed use zone to form a larger area than the proposed heritage precinct boundary. Inclusion of this broader area would result in more non-contributory buildings within the heritage overlay on the north side of the railway line.

Elsewhere, shops of potential contributory value at 48, 48A and 50 Murrumbeena Road are omitted from the proposed precinct. These three early twentieth century shops are comparable to many included within the proposed precinct as contributory places. Council signage indicates that these three shops are within the Murrumbeena Village.

On closer inspection, some buildings identified in the citation to have contributory value to the precinct are not particularly intact and/or remarkable, and their contributory value to the precinct as a known and valued element seems overstated. This indicates that the threshold that has been applied for aesthetic significance is too low.

Figure 8: Looking southwest from the railway station entrance. South of the railway line is Wardop's Buildings, a 'stand-out' building of the precinct (visible towards centre). This south portion of the proposed precinct contains a higher proportion of heritage fabric than the north portion (Photograph: April 2020)



Figure 9: Former branch of the State Savings Bank of Victoria in Murrumbeena Road, south of the railway line (Photograph: April 2020)



Figure 10: The boundaries of the proposed Murrumbeena Village Precinct heritage overlay are not consistent with signage. In Neerim Road, signage indicates that the village commences further east at Hobart Road (Photograph: April 2020)



Figure 11: A group of three early twentieth century shops at 48, 48A and 50 Murrumbeena Road, which are not included within the proposed precinct (Photograph: April 2020)



In terms of intactness, the shops on the subject site (No's 430, 432 & 434) are a case in point. The site formerly had a pair of two-storey shops and a single-storey shop. One of the pair of two-storey shops (No 432) and the single-storey shop (No 434) have been demolished and rebuilt.

Photographs of the remaining two-storey shop in its original condition, show it and its pair probably to be of Edwardian and not Victorian origin, as is claimed. The detailing on the shop is unusually restrained for a building claimed to have been erected around 1890, at the height of the Land Boom. Commercial buildings of this era are generally more ornate, and this is noted by Built Heritage in their description of Boom-style buildings in Glenhuntly Road, which are described as:

*...incorporating typical Boom-style details such as arched windows, moulded cornices and balustrading.*⁹

The removal of one of the pair (No 432) has had a big impact upon the character and setting of the remaining shop on this site (No 430). Other changes have further diminished the remaining heritage value of the remaining two-storey shop. These include:

- 1950s shopfront fitted to the Neerim Road elevation;
- Cantilevered awning fitted across the entire Neerim Road elevation and partially returning along the Murrumbeena Road elevation;
- Removal of a cornice on the Neerim Road elevation and part of Murrumbeena Road elevation;
- Concealment of the window openings on the Neerim Road elevation and removal of the projecting rendered cill detail;
- Removal of windows on the ground floor of the Murrumbeena Road elevation;
- Removal of a single-storey wing along the Murrumbeena Road elevation;
- The addition of a Modernist two-storey red brick Post-war addition built along the Murrumbeena Road frontage. This conceals the rear elevation and its painted signage which is intact.

Internally, a portion of the party wall (east elevation) on the ground floor has been removed, in order to consolidate the internal spaces of the former shops. A row of columns now support the roof further east between the two single-storey shops (No's 432-434).

In its current condition, the two-storey shop (No 430) contributes little to the recognised historical and aesthetic character of this precinct. In comparative terms, with other corner buildings in the precinct, at the intersection of Neerim and Murrumbeena Roads south of the railway line, it is poor comparison. In terms of this site, the threshold for contributory value of this building has been applied too low.

9 Built Heritage, 'Murrumbeena Village Precinct', p 12.

Figure 12: A 1950s
shopfront is on the
Neerim Road
frontage of the shop
at No 430
(Photograph: April
2020)



Figure 13: The
Murrumbena Road
elevation of the
shop at 430 Neerim
Road (Photograph:
April 2020)



A number of shopping centres have been used in a comparative analysis in the citation. It describes the Murrumbeena Village Precinct as being consistent with many others, rather than being of importance within Glen Eira. Another shopping centre that was not assessed, is the Hawthorn Road shopping centre, south of the Grand Union Tramway Junction¹⁰ in Caulfield North. It contains cohesive groups of Inter-war retail buildings amongst later development. Those inter-war buildings demonstrate a range of architectural styles of the period, including other styles eg English Vernacular Revival which are not found at Murrumbeena. Further south in Hawthorn Road, at the intersection of Glen Eira Road, is a further collection of early-twentieth century shops.

The importance placed in the comparative analysis that development at Murrumbeena extended in a radial fashion, and not linear, as were other shopping centres, is, I believe, overstated. Other shopping centres did radiate in some form or another from their respective railway station eg Caulfield shopping centre (Derby Road) radiates to the east, north and west of its station. Caulfield North is of interest as it radiates from a junction of three tram routes (Grand Union Tramway Junction). Whereas, the characteristic of interest, rather than of any great importance, at Murrumbeena, is the off-set of Neerim Road's intersection with Murrumbeena Road north and south of the railway line.

Figure 14:
Hawthorn Road,
Caulfield North,
south of the Grand
Union Tramway
Junction, contains
cohesive groups of
early twentieth
century shops.
(Photograph: April
2020)



10 The term 'Grand Union Tramway Junction' refers to the four-way junction at the corner of Balaclava and Hawthorn Roads, which allows trams to turn in any direction. The last in Australia, it is included on the Victorian Heritage Register VHR H0227 Grand Union Tramway Junction and a site-specific heritage overlay in the *Glen Eira Planning Scheme* HO148 Grand Union Tramway Junction.

In terms of Council's Part A submission, it recommends portions of sites along the south side of Melbourne Street should be removed from the proposed heritage overlay. In as far as the subject site, this is supportable, as it excludes from the precinct a Post-war addition on this site that has no recognised heritage value. This is consistent with other parts of the proposed heritage overlay, where I note a Post-war addition to the side of a commercial building at No 69 Murrumbeena Road is identified as 'non-contributory' on the plan of the precinct in the citation. However, the proposed boundary line prepared in the Part A Submission is arbitrary, as it extends through a portion of the Post-war addition. Rather, the boundary line should respond to old and new heritage fabric on this site.

The Panel raised at the Directions Hearing the question as to whether the Murrumbeena Village is considered an intact precinct? It is my view that it is not. While parts of the shopping centre south of the railway line are cohesive in early twentieth century built form, the north part of the proposed heritage overlay has been impacted upon by a significant level of change that has diluted heritage stock down to a level where only about 60% of the buildings are recognised to be of contributory value. This figure would be lower if a more rigorous assessment of aesthetic value was applied.

Figure 15: This modest two-storey shop at 466 Neerim Road, is identified to be a contributory building of the Murrumbeena Village Precinct. (Photograph: April 2020)



Figure 16: This modest single-storey shop at 468 Neerim Road, is identified to be a contributory building of the Murrumbeena Village Precinct. Very little fabric remains that provides evidence of its Victorian origin. (Photograph: April 2020)



Another question raised by the Panel at the Directions Hearing was whether the thresholds for meeting criterion are too low? It is my view that they are. The amount of change that has occurred to some buildings means they do not meet the threshold for heritage significance for aesthetic values (Criterion E). Many were modest examples of shops of their era, and changes that have occurred have further diminished their heritage value. In terms of the shop on the subject site, it no longer demonstrates any aesthetic value, or any clear indication of its early origin.

A similar observation can be made of the other early building in this portion of Neerim Road (No 468), which has also been remodelled so much, evidence of its nineteenth century origin is now limited to a rendered cornice extending between two consoles. Like the shop on the subject site (No 430) it provides little visual evidence in its fabric to be interpreted as one of the street's earliest shops.

In terms of historic value of this precinct, I do not believe Council has established that it meets a threshold of being considered of importance to the cultural history of Glen Eira (Criterion A). The comparative analysis with other shopping centres has not established what sets Murrumbeena Shopping Centre apart from others in terms of historical and aesthetic importance.

Given the low level of heritage value of buildings in parts of the heritage overlay, and the absence of the cohesion of built form that is claimed by Council, for this reason I recommend that Council explore a non-contiguous heritage overlay north of the railway line.

In terms of the Panel's question at the Directions Hearing about non-contiguous heritage overlays, these are a recognised form of applying a heritage overlay to elements that are physically separated from other similar elements of a consistent theme. They are noted in the Practice Note: Applying the Heritage Overlay as an acceptable method of applying the heritage overlay.

Recent work I have undertaken for the City of Port Phillip has applied this approach to applying heritage controls to Inter-war housing in the HO8 Elwood: Glenhuntly and Ormond Roads Precinct. That housing was excluded in earlier heritage studies because it did not form a contiguous group or cohesive streetscapes of dwellings of a similar era. The Amendment is currently before Planning Panels Victoria, Amendment C174 of the *Port Phillip Planning Scheme*.

CONCLUSION & RECOMMENDATIONS

In my view, there are some merits in aspects of the proposed Murrumbeena Village Precinct heritage overlay. However, I believe further analysis is needed, of the portions north and south of the railway line, and the fabric within it, before heritage controls of a sound basis can be applied.

The level of cohesion of built form that is claimed in the statement of significance in the citation for this heritage overlay is not there, and this is demonstrated on the north side of the railway line, where 40% of the buildings are marked non-contributory.

Further analysis needs to be done in understanding the integrity of the early fabric, and how it contributes to the precinct. In the instance of the subject site (No 430), the premise for its contributory value is that portions of it are old. The citation should go beyond this, and articulate how in its significantly altered form the shop remains an element of intrinsic value to this shopping centre, as do other two-storey corner shops like Wardrop's Buildings. In my view, the citation has not done this, and the aesthetic value of this shop, and many others, has not met the thresholds for Criterion E (Aesthetic Value)

To meet Criterion A (Historic Value), a place must be of historical importance to Glen Eira. The citation documents the historical evolution of the suburb, its growth spurts triggered by land speculation of the Land Boom at the end of the nineteenth century, and more importantly the electrification of the metropolitan rail system from 1919. These are factors that affected most middle, and even some outer ring, suburbs of Melbourne. The comparative analysis of the shopping centre has not articulated why Murrumbeena's impact from this was any more important than to other suburbs.

The comparative analysis with other shopping centres should also go beyond general descriptions of these, and really establish what sets Murrumbeena Shopping Centre apart from these. I also recommend that Hawthorn Road, Caulfield North is assessed, as it contains strips of cohesive inter-war built form of comparable aesthetic quality, if not, in places, superior, to the built form at Murrumbeena Village.

On this basis, I recommend that the heritage overlay for the Murrumbeena Village Precinct does not proceed in its current form, and that the proposal is refined. In further work, I recommend that:

North of the Railway Line

- That the individual heritage overlay (HO187) is removed from the shop at 430 Neerim Road;
- No 430 Neerim Road is not included within any heritage precinct, or non-contiguous heritage overlay, as a contributory place;
- Further analysis is done on the early fabric (pre-World War II) to understand its contributory heritage value to the precinct;
- Explore instead of a precinct-based control, a heritage overlay of non-contiguous elements (based on further analysis of fabric – see previous point);

- An individual heritage overlay applied to the site of the automotive repairer at 504 Neerim Road (now Bowen Automotive). It is notable aesthetically for its robust architectural form, and historically for its continuous use in the automotive trade since the 1920s;
- An individual heritage overlay to the shops south side of Neerim Road, with its breezeway to station (No's 465-473), which is notable aesthetically as it retains its 1920s shopfronts, and historically as a remnant of the complex of buildings around the original railway station.

Figure 17: On the north portion of the railway line, explore instead of precinct-based controls, individual heritage overlays and non-contiguous heritage overlays. For example, this 1920s garage, at 504 Neerim Road, should be considered for an individual heritage overlay (Photograph: April 2020)



South of the Railway Line

- A precinct-based heritage control to include buildings at, and in the environs of, the intersection of Murrumbeena and Neerim Roads;
- An individual heritage overlay to Wardrop's Building in Murrumbeena Road (No's 77-79);
- An individual heritage overlay to the former branch of the State Savings Bank of Victoria in Murrumbeena Road (No 84).

General

- Further comparative analysis of this shopping centre with others within Glen Eira, these should include Hawthorn Road, Caulfield North, which demonstrates fine and cohesive collections of inter-war commercial buildings.
- Removal of reference to Bruce & Carey and Moran & Cato being city-based retailers, as I understand these were based in Prahran and Fitzroy respectively.

This list of recommendations is not exhaustive. Rather, it provides some broad parameters as to how heritage controls should be applied in the Murrumbeena Village Precinct in the future, in order to properly manage its heritage assets.

It is my opinion, in its current form the heritage overlay should not proceed.

DECLARATION

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.



Peter Barrett
Master of Architectural
History & Conservation (Melb.)