

CITY OF MAROONDAH

AMENDMENT C128

1 & 3-5 WONGA ROAD, RINGWOOD NORTH

STATEMENT OF EXPERT EVIDENCE



Prepared for
The City of Maroondah
4 December 2019



HERITAGE PTY
LTD
ACN 134 988 110

architectural historians
heritage consultants

TWENTIETH CENTURY SPECIALISTS

PO Box 222 Emerald 3782
phone 9018 9311

www.builtheritage.com.au

A: INTRODUCTION

A1 BACKGROUND & BRIEF

This Expert Witness Statement has been prepared for the Maroondah City Council by Simon Reeves, director and principal of Built Heritage Pty Ltd, for the Independent Panel appointed to consider submissions received in response to the exhibition of Maroondah City Council Planning Scheme Amendment C128. This amendment proposes to apply a heritage overlay to a property at 3-5 Wonga Road, Ringwood North, and parts of the adjacent property at 1 Wonga Road.

I have been briefed to provide my views on the heritage consideration of Amendment C128, encapsulating responses to submissions that have been received as well as to outline my ongoing involvement in the preparation of the relevant documentation.

A2 STATEMENT OF QUALIFICATIONS AND EXPERIENCE

My name is Simon Reeves and I am the Director and Principal of Built Heritage Pty Ltd, a firm of architectural historians and heritage consultants based in Emerald, Victoria. I am an architecture graduate, holding the degrees of *Bachelor of Planning & Design* and *Bachelor of Architecture (Hons)* from the University of Melbourne, conferred respectively in 1994 and 1998.

Since 1998 I have worked full-time as an architectural historian and heritage consultant, initially with Allom Lovell & Associates (1998-2002) and then with Heritage Alliance (2002-2009). In January 2009, I established my own practice, Built Heritage Pty Ltd, to specialise in twentieth century heritage and, particularly, the heritage of the post-WW2 era.

Since forming my own practice in 2009, I have been commissioned to undertake several large-scale heritage projects for municipal councils, notably the *Shire of Bass Coast Heritage Study (Stage 2): Post-Panel Implementation* (2009), the *City of Boroondara Thematic Environmental History* (2011), the *Balwyn & Balwyn North Heritage Study* (2012-13), the *City of Whitehorse Post-1945 Heritage Study* (2013-14), Stage Two of the *Frankston City Post-War Heritage Study* (2014-15), and the *City of Maroondah Heritage Review* (2017-18).

I have completed individual heritage assessments (or other smaller-scale heritage projects) for the City of Maribyrnong, City of Brimbank, City of Boroondara, City of Greater Dandenong, Mornington Peninsula Shire Council and the City of Ballarat. My experience in dealing with heritage issues in local government also encapsulates stints as regular heritage advisor to the Rural City of Swan Hill (2002-2009), the Shire of Gannawarra (2002-2009), the City of Brimbank (2003-2004) and the Shire of Bass Coast (2002-2012). At various times, I have also provided casual or locum heritage advice to the Cities of Maribyrnong, Moreland and Maroondah (in the latter case, from August 2018 to date).

I have appeared as an expert witness in heritage matters on many occasions, including at VCAT hearings, registration hearings held by the Heritage Council, and independent panel hearings for planning scheme amendments for the Cities of Bayside, Boroondara, Melbourne, Port Phillip, Whitehorse, Wyndham and the Shire of Mornington Peninsula.

I am currently a member of ICOMOS International, and have, at various other times, been a member of DoCoMoMo Australia, the National Trust of Australia (Victoria), the Society of Architectural Historians of Australia & New Zealand (SAHANZ), the Art Deco & Modernism Society of Victoria, the Walter Burley Griffin Society, the Australian Garden History Society and the Robin Boyd Foundation.

A full *Curriculum Vitae* is included as in Section D of this statement.

A3 STATEMENT OF AUTHORSHIP

This expert witness statement, and the component tasks of historical research, fieldwork and analysis that underpins it, represents the work of Simon Reeves. There have been no other significant contributors to this statement. With the exception of those whose work or opinion has been quoted and referenced in the text to support my own viewpoint, no other persons have carried out any tests, experiments or investigations upon which I have relied.

A4 DECLARATION

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



4 December 2019

B: METHODOLOGY

B1 SUMMARY OF METHODOLOGY

My firm, Built Heritage Pty Ltd, was engaged by the City of Maroondah (hereafter COM) in December 2017 to undertake the City of Maroondah Heritage Study Review. This was to include a review of places identified in an earlier heritage study (but not yet protected), and to identify new places/areas of potential significance via desktop research and a municipality-wide windscreen survey (ie, visual identification of places of potential significance whilst driving). Citations would be prepared for places/areas deemed to represent the highest priority.

Desktop research included a review of Built Heritage's in-house database of post-WW2 Australian architecture, an index of contemporary published sources we have compiled since 2005. The database included reference to a house in Wonga Road, Ringwood North, designed by architects Meldrum & Noad and profiled in *Australian Home Beautiful* in 1942 (hereafter 1942 AHB article). On that basis, the property was added to our master-list of places of potential significance.

In March 2018, I was advised by the COM that the property at 3-5 Wonga Road (hereafter referred to as the subject site) was being flagged for local heritage listing, independently of our own work on the heritage review. This was based on the recommendation of the then heritage advisor, the late Willys Keeble, who had provided a preliminary assessment of the building as far back as November 2016.

In June 2018, the COM provided me with a draft citation for the property prepared by Ms Keeble. She subsequently revised the citation at least twice before her death on 27 August 2018. While the "final version" included my name as co-author (not, incidentally, at my request), I was not actually involved in the historical research, fieldwork or preparation of text. My contribution was limited to suggesting two other local houses for inclusion in the comparative analysis.

When provided with a copy of the citation, I was asked to provide feedback and indicate whether I supported the recommendation for a HO. Mindful of the fact that we had already included the property on our own master-list of places of potential heritage significance, I stated that I was in support of Ms Keeble's recommendation and considered the citation to be excellent. I was not requested to provide a peer review of the citation, nor to verify any of the factual statements or conclusions contained within the citation.

In September 2018, I was provided with a copy of the final citation, so that it could be included as an appendix to our COM Heritage Study Review, which was then being finalized.

In December, I suggested that a suitably qualified person should assess the landscaped setting of 3-5 Wonga Road by comparing plant/tree species named in the 1942 AHB article with what remains visible today. An in-house assessment was subsequently undertaken by the COM, the outcome of which was a schedule (designated as "Annexum 2") identifying six specific trees for inclusion in the HO. I was provided with a copy of this schedule "for information only".

In February 2019, following feedback that the COM received from DEWLP, I was asked to undertake further investigation into the significance of the 1960s stone wall along Warrandyte Road, which Ms Keeble had mentioned as part of the significance of the place. After conducting a site visit and attempting some historical research, I concluded that the wall was only representative of its type and era (noting the existence of several other rock walls of similar form and vintage elsewhere in the municipality, particularly in elevated parts of Ringwood North). As such, we concluded that the wall was of no significance in its own right, nor did it really contribute to the broader significance of the subject site. References to this wall were subsequently deleted from the citation.

In March, we submitted to COM the “final draft” of our COM Heritage Study Review, comprising a review of the existing Thematic Environmental History, and new citations for 19 individual places and four precincts. Two stand-alone citations prepared by Ms Keeble, including that for 3-5 Wonga Road, were included as an appendix. To date, the draft report has not been released to the public. We have been advised that a second stage, providing further citations for other places and precincts identified in our original master-list, was likely to be commissioned in the future.

In September, I was advised that the citation for the subject site had been placed on public exhibition and that two submissions had been received, one of which (from the owner of 3-5 Wonga Road) objected to the proposed HO. As the latter submission, dated 2019, objected to the proposed HO on general terms, without actually citing specific grounds, I could only advise the COM that it did not provide an adequate justification for the proposed HO to be abandoned.

I was subsequently provided with a copy of a report, dated 26 July 2019, prepared by Lovell Chen (hereafter referred to as the Lovell Chen report). It became apparent, as the Lovell Chen report predated the objecting submission mentioned above, that the latter had been paraphrased from the former. Having access to the full report, which included a considerable amount of supplementary historical research, I could now concur with its findings. Based on the primary documentation provided by Lovell Chen, I agreed that

- Ms Keeble had been mistaken when suggesting that the property was occupied/maintained by the Turner family for many decades, when in fact the property had been subdivided by them in the later 1940s, whereupon they built a second house at what is now 1 Wonga Road;
- An element of doubt had emerged regarding the age of the stone gateposts and driveway walls at 1 Wonga Road, with aerial photographs suggesting that they were built around the time of road reconstruction works in the 1960s, rather than as part of the original house in the 1940s.

On the basis of this new information, I concurred that there was no longer any basis for the 1960s additions to the original house to be considered as contributory elements (as they were not added by the original owners, the Turner family) and that, as there was an element of doubt as to the age of the stone gateposts and driveway walls, they should not be included in the proposed HO. The COM subsequently requested that a new Statement of Significance be prepared by Lovell Chen, reflecting the findings of their report.

While the Lovell Chen report also took issue with the number of remnant trees that should be specifically mentioned as part of the proposed HO, I refrained from comment on the issue, as I do not possess the necessary horticultural qualifications. Instead, I suggested that the COM engage a suitably qualified professional to provide an expert opinion on which trees were worthy of inclusion. On my recommendation, the office of John Patrick was engaged for this purpose. His recommendation ultimately fell between the previous recommendations of the COM and Lovell Chen, in that he identified only three specific trees as being worthy of inclusion in the HO.

Following a meeting in November 2019, attended by the present writer (via conference call), John Patrick and representatives of the owner of 3-5 Wonga Road, the COM and Lovell Chen, it was resolved to adopt the citation prepared by Lovell Chen, as further amended to incorporate John Patrick’s recommendations on the remnant trees.

As the age of the gateposts/stone walls still remains unconfirmed in my mind, I advised the COM that I stood by my viewpoint that the amended Lovell Chen citation for 3-5 Wonga Road be adopted, rather than the exhibited one. I further recommended that the significance of 1 Wonga Road be subject to a separate assessment, perhaps undertaken as part of a broader assessment of a potential precinct that might consider the remnant trees at No 7 Wonga Road and a large inter-war house at No 9-11. It is duly noted that a potential precinct along this part of Wonga Road had been flagged by Ms Keeble as far back in November 2016, and also (independently) by the present writer during the scoping for the COM Heritage Study Review in early 2018.

B2 DETAILED CHRONOLOGY OF METHODOLOGY

<p>2017 Dec 20</p>	<p>My firm, Built Heritage Pty Ltd, was engaged by the City of Maroondah to undertake the <u>City of Maroondah Heritage Study Review</u>. This was to include, <i>inter alia</i>, identification of places of potential significance through desktop research and a municipality-wide windscreen survey.</p> <p>The house at 3-5 Wonga Road was one of the properties that we identified during the desktop research phase. It came to our attention because our in-house database of post-WW2 Australian architecture included reference to the 1942 AHB article.</p>
<p>2018 Mar 21</p>	<p>I was first made aware of a proposed heritage listing of 3-5 Wonga Road when the COM forwarded an email to me from Ms Keeble to Greg Harris (dated 30/11/2016), flagging the potential heritage significance of the subject site. Ms Keeble's email noted:</p> <p><i>Australian Home Beautiful has a 6 page article on the place with detailed description. In the 1920's the 1.5 acre site was owned by Frank Valentine Parker (AIF service, Military Medal). He established an extensive ornamental garden there with the tennis court and driveway shown on plan, but never built on it. John Turner bought site in 1940, engaged well known architects Meldrum and Noad. The 1942 house is intact with a large, sympathetic extension on the west side.</i></p> <p><i>I inspected and photographed the site on Monday. The heritage value of the "Thaloo" site (now subdivided) has various aspects;</i></p> <ul style="list-style-type: none"> <i>• The siting- elevated, views to Dandenongs etc. demonstrates cultural values of early 20thC 'hill station' type settlement</i> <i>• Aesthetic and scientific (technical) value of massive retaining wall on W side with heroic rockwork.</i> <i>• 1 Wonga Road (with modern house) has the original <u>Thaloo</u> gate posts, name plate, driveway entrance, some original trees and historic (c1900) Hawthorn hedge on 2 sides,</i> <i>• 3-5 Wonga Rd, with the Meldrum Noad house and much veg from the 1920's Parker garden. Early Modernist design with large banks of windows, termed 'Early Colonial' by AHB</i> <i>• 7 Wonga Rd has some large trees from the original garden.</i> <p><i>Then there is the heritage value of 9-11 Wonga Rd with 1929 house originally adjoining the Parker/Turner land. This property was recommended for the HO in the 2003 Study (but for reasons unknown? was eliminated from Council's heritage amendment) - inspected last Monday, property unchanged from 2003 report.</i></p> <p><i>In my view there is a good case for an HO extending from the intersection of Warrandyte and Wonga Roads to the north boundary of 9-11 Wonga Road.</i></p> <p>Also on this day, I was emailed a copy of one page report prepared by Ms Keeble, entitled "Heritage advisor comments", regarding "Possible heritage significance of residential property <u>Carrama</u>, formerly <u>Thaloo</u>, at 3-5 Wonga Road". This report was dated 29 November 2016.</p> <p>At this stage, this documentation was provided to me merely "for information only", as I was still in the early stages of undertaking the <u>City of Maroondah Heritage Study Review</u>.</p>

2018 Jun 7	<p>I was emailed a copy of a draft heritage citation for the property prepared by Ms Keeble, dated 24 May 2018. This two-page draft citation was incomplete, providing a brief Statement of Significance, history and description, but with only a few notes on the comparative analysis, indicated as “to be completed”.</p> <p>In her covering email to me, Ms Rivero indicated that she had recently spoken to DELWP about the proposed heritage listing of 3-5 Wonga Road and that “they mentioned that since we are undertaking the heritage study review, they would like to see some comments from you on the proposed listing”.</p> <p>I also asked to confirm that the property had been independently flagged by me as part of our heritage review, and whether I would be supportive of Ms Keeble’s proposed Statement of Significance.</p>
2018 Jun 8	<p>Replying to the previous day’s email, I advised COM that I concurred with Mrs Keeble’s findings and supported her recommendation for an individual HO. I indicated that I was happy with the proposed Statement of Significance, including the proposed inclusion of the entry gates/signage at 1 Wonga Road.</p> <p>My only other comment on the citation was that I had “a couple of minor observations that might bolster her comparative analysis”. I advised that I would provide this information to Ms Keeble when she contacted me.</p>
2018 Jun 13	<p>Ms Keeble emailed me a copy of her citation-in-progress, stating that she would “really welcome my comments”.</p>
2018 Jun 14	<p>Replying to Ms Keeble’s email, I reiterated that I considered her citation to be excellent, establishing a strong case for local significance. Drawing from the desktop research and windscreen survey that we undertook in the early stages of the <u>COM Heritage Study Review</u>, I identified two buildings that I indicated might be included in her comparative analysis.</p>
2018 Jun 15	<p>I confirmed to COM that the subject property, 3-5 Wonga Road, had previously been identified by us during our desktop research for the <u>COM Heritage Study Review</u>.</p> <p>I explained that we were aware of the property because the 1942 article in the <u>Australian Home Beautiful</u> came up in our in-house database of post-WW2 Australian architecture, which was a key course in scoping places of potential heritage significance in the municipality. As I put it in my email,</p> <p><i>So, in other words, it was on our radar already, before I even knew that Willys had done a citation for it...</i></p>
2018 Jul 3	<p>I was emailed what was described to me as “the final amended citation for 3-5 Wonga Road”, prepared by Ms Keeble and dated 22 June 2018. This was a three-page document with Statement of Significance, history, description and a completed comparative analysis. This comparative analysis included reference to the two local comparators I had recently brought to Ms Keeble’s attention.</p>
2018 Sep 20	<p>I was emailed what was described to me as “the revised citation”, prepared by Ms Keeble and dated 27 July 2018.</p> <p>It is noted that, in the interim, Ms Keeble had died (on 27 August 2018)</p>

	<p>The covering email from Ms Rivero noted that Ms Keeble had recommended that the citation should include twelve illustrations (including recent photographs and excerpts of the 1942 AHB article). It was also noted that Ms Keeble had commented that “we probably don’t need tree controls as this is covered by a Significant Landscape overlay. Interior controls aren’t needed. Paint controls would be good to include”.</p> <p>At this time, I was not asked to provide any comment on the citation itself. Rather, it was being sent to me so that I could include it as an appendix to the <u>City of MaroonDAH Heritage Study Review</u> that we were then finalizing.</p>
2018 Dec 20	<p>I was emailed what was described to me as the “final citation”. This was dated 22/06/2018 and was actually the same version that had been previously sent to me on 03/07/2018 (ie, not incorporating minor changes made for the so-called “revised citation” dated 27/07/2018).</p> <p>I was also provided with a reformatted version of the same material, proposed to be incorporated into the planning scheme, as well as draft clause 43.01. The latter identified the subject property as “former Thalloo house and remnant garden, 3-5 Wonga Rd, and Thallo gateway and drive, 1 Wonga Rd, Ringwood North”. It also referenced Statement of Significance, 22 June 2018, credited to Willys Keeble and Simon Reeves. The draft HO schedule also indicated that tree controls would apply, but not interior controls or external paint controls.</p>
2018 Dec 21	<p>I replied to the previous day’s email, indicating that I was happy with the proposed citation but that it might be worth having a closer look at the landscaping elements. Noting that the 1942 AHB article mentioned a number of specific tree and plant species, I suggested that someone with the appropriate expertise (eg council arborist) should look at the property to see if any of those trees or plants still remain.</p>
2019 Jan 16	<p>As the Council report for Amendment C128 was in preparation, I was advised that the proposed HO146 would apply to 3-5 Wonga Road, with reference to the gate posts, wrought iron gate and stone walled driveway at 1 Wonga Road.</p> <p>I was provided with copies of two documents: (a) the “revised statement of significance for Amendment C128”, which included the recommendation for paint controls; and (b) an undated document entitled “Annexum [sic] 2”, that had been prepared by a member of COM staff and identified six mature trees that were deemed to be worthy of inclusion in the proposed HO. I was told that I had been provided with the latter document “for information only”.</p>
2019 Feb 11	<p>I was advised that, as the scope of Amendment C128 was to intended to consider the property at 3-5 Wonga Road, and the associated gate at 1 Wonga Road, the assessment of other components, namely any remnant landscaping at Nos 1 and 7 Wonga Road would need to be undertaken as a separate exercise, as part of a broader assessment of a potential precinct covering the properties at Nos 1-11 inclusive.</p> <p>I was also asked to provide further comment/evidence on the significance of the stone retaining wall along the Warrandyte Road frontage “identified as being constructed at a later date”.</p>

2019 Feb 15	<p>Having visited the site, examined the stone retaining wall along Warrandyte road, and attempted further historical research to confirm its date, I advised COM that I considered the wall to be merely representative of its type and, as such, not worth specifically identifying as part of the significance of the site.</p> <p>References to this stone wall were subsequently deleted from the citation.</p>
2019 Mar 21	<p>Submission to COM of “final draft” of our <u>COM Heritage Study Review</u>, comprising a review of the Thematic Environmental history, citations for nineteen individual places and four precincts, and an appendix with two stand-alone citations prepared by Ms Keeble including the one for 3-5 Wonga Road. The draft report has not yet been released to the public.</p>
2019 Sep 3	<p>I was advised that Amendment C128 had been placed on public exhibition and that two submissions had been received: one from Vic Roads (expressing no concerns) and another from the owners of 3-5 Wonga Road (objecting to the proposed HO).</p> <p>It was explained to me that the exhibited documents were “the result of numerous revisions recommended by the Department, including the deletion of a lot of the historical information and comparative analysis from the Statement of Significance”.</p>
2019 Sep 23	<p>I provided COM with a preliminary response to the objection. My conclusion was that, as the submission objected to the proposed HO without providing any supporting evidence, the citation should stand as it was.</p>
2019 Oct 28	<p>I was now provided with a 17pp document prepared by Lovell Chen, dated 26/07/2019 and headed “memorandum to council”, which constituted “a preliminary review of the citation for the property at 3-5 Wonga Road, Ringwood North”.</p> <p>Underpinned by supplementary research of postal directories, title certificates and vintage aerial photographs, the Lovell Chen report identified several flaws in Ms Keeble’s methodology, notably her assumptions that the Turner family occupied the house at 3-5 Wonga Road for many years, and that the gateposts at No 1 were associated with their original phase of occupation. Evidence was provided to show that the Turners subdivided the land as early as 1946, building themselves a new house at what is now 1 Wonga Road, and that the stone gateposts/walls appeared to date from the period when the roads were reconstructed in the early 1960s.</p> <p>The report concluded that the 1942 portion of the house “demonstrates a prima facie case for significance at the local level, but not including all the elements/attributes identified in Council’s assessment and Statement”.</p> <p>Specifically, it was noted that:</p> <ul style="list-style-type: none"> • The 1960s additions to the house should be considered as non-contributory rather than contributory elements; • Only <u>two</u> of the six mature trees listed in the citation should be included • The stone gateposts and retaining wall at 1 Wonga Road should not be included, as evidence suggested that they dated from the 1960s rather than the 1940s

2019 Oct 31	In responding to the Lovell Chen report, I advised the COM that I considered the new historical evidence submitted to provide a compelling case for their conclusions. Consequently, I recommended that the citation be updated and amended along the lines suggested by Lovell Chen. No additional comments were made in relation to the trees of significance.
2019 Nov 6	I was advised by the COM that a late submission had been received from the owner of 1 Wonga Road. This submission, which took the form of a brief email dated 6/11/2019, supported the proposed HO in its exhibited form (ie, including stone gateposts/walls). The submitter appended a copy of the 1942 AHB article as well as a short article from the <u>Ringwood Mail</u> that discussed the property that the Turners then occupied at 1 Wonga Road.
2019 Nov 8	I was provided with a copy of a revised Statement of Significance prepared by Lovell Chen, which addressed the concerns raised in their earlier report.
2019 Nov 11	<p>I advised the COM that I considered the new Lovell Chen citation to be adequate, with the following provisos:</p> <ul style="list-style-type: none"> • That, as I am not qualified to assess the botanical significance of landscape elements, I would defer to the opinion of the Council Arborist on the matter of the remnant trees; • That, while Lovell Chen had provided compelling evidence to introduce an element of doubt on the age of the stone gatepost/walls, my opinion may change if even more compelling evidence (such as historic photographs or original drawings) was submitted by the owner of 1 Wonga Road. <p>In regard to the matter of the trees, I advised COM to engage the services of an arborist/horticulturist with experience in heritage matters. On my specific recommendation, the office of John Patrick was consequently engaged.</p>
2019 Nov 18	<p>A meeting took place to discuss the revised citation, particularly in the light of John Patrick's assessment of the trees. The meeting was attended by the present writer as well as Kate Gray and Michael Cook (Lovell Chen), Robbie McKenzie (Ratio Consultants), John Patrick, Cristina Rivero (COM) and Simone Jackson (Maddocks).</p> <p>Following the meeting, it was agreed that a revised citation (further tweaked to include one additional tree, as recommended by John Patrick) would be supported by all parties.</p>
2019 Nov 21	My latest advice to the COM was that the amended Lovell Chen citation should be adopted, rather than the exhibited one, and that the significance of 1 Wonga Road (including the house, its landscaped setting and its stone wall and gateposts) be subject to a separate assessment, perhaps as part of a broader assessment of a potential precinct along Wonga Road.



C: RESPONSE TO SUBMISSIONS

Note: The three submissions are discussed here in the order that they were provided to me, which is not the chronological order in which they were actually prepared. While Submission 1 (dated 8 August 2019) was clearly prepared as a brief summary of issues raised in the more detailed Submission 2 (dated 26 July 2019), I was not made aware of Submission 2 until after I had already responded to the issues in Submission 1.

C1 SUBMISSION 1 (8 AUGUST 2019)

The document referred to here as Submission One is in the form of a 3pp letter, dated 8 August 2019, to Phil Turner (COM) from Robbie McKenzie (Ratio Consultants), on behalf of the owner of 3-5 Wonga Road. The submission objects to the proposed HO on several grounds, listed below with my own responses, summarized from advice provided to council on 23 September 2019.

- *The proposed Statement of Significance does not properly explain the history and associated heritage value of the land*

A Statement of Significance typically contains only a limited amount of historical data, with more extensive documentation to “properly explain the history” found elsewhere in the citation.

It is worth noting that, at the time I was provided with a copy of the Submission One, I was unaware that the objector has only been provided with the Statement of Significance, rather than the full citation, with history, comparative analysis, etc. It is now conceded that this would account for the submitter’s assertions that historical data and comparative analysis was lacking.

- *The propose Statement of Significance lacks rigour as it is does not adequately supported by historical evidence (eg title records, photography, etc) and fails to offer any comparative analysis*

Historical evidence exists in many forms, not all of which must necessarily be consulted in preparing of heritage citation. The 1942 AHB article was a rare and valuable primary source, as it not only included historical images and architectural attribution (information that is otherwise notoriously difficult to track down) and confirmed the date of the building and original owner’s details (thus negating the need to consult the usual sources to establish such data, such as title certificates, rate books and postal directories).

- *The proposed Statement of Significance contains factual errors and assertions that are not supported by evidence*

As the submitter has not specifically identified the alleged factual errors and assertions, it is not possible to provide a considered response. In the absence of further detail, it can only be stated in general terms that a distinction clearly exists between factual errors that will have an impact on an assessment of heritage significance (eg misdating of a place for which significance is ascribed due to the date), and those that will not (eg misspelling of a person’s name).

- *The proposed Statement of Significance overstates the heritage significance of the land including building, remnant garden, landscape features, driveway and the trees proposed to be covered by HO146.*

As above, the suggestions of “overstated significance” are outlined in very general terms, without going into specifics. The citation ascribes heritage significance to the property on the basis that the house was designed by the noted architectural firm of Meldrum & Noad (which is correct), its unusual design combining modern and traditional influences (also true, and demonstrably rare and unusual in a local context) and its remnant landscaped setting evocative of an elevated ‘hill station’ (also true, and similarly rare and unusual in a local context). The submission provides insufficient evidence to indicate how any of this has been overstated.

- *The extent of land proposed to be covered by proposed HO146 is excessive*

The proposed extent of HO146 corresponds to the titles boundaries of the subject site at 3-5 Wonga Road. As it is standard procedure for an individual heritage overlay on a single residential property to extend to the title boundaries (in order to provide a degree of control over any future development that might impact the significant elements), this cannot be considered excessive.

The proposed inclusion of the driveway and gateposts of the adjacent property (1 Wonga Road) can also hardly be considered excessive, as it constitutes only a tiny percentage of that property.

- *The original house is not particularly remarkable and its setting has been significantly modified and diminished since its 1942 construction, thereby compromising its appreciation from public view.*

As the word “remarkable” can be defined as “worthy of attention”, the subject building would surely be considered remarkable, if only for the fact that it was deemed to be “worthy of attention” by the editors of *Australian Home Beautiful* when subjected to a lavish six-paged illustrated feature article in the magazine’s May 1942 issue. “Remarkable” can also be defined as “unusual or special and therefore surprising”. This definition also applies, as the comparative analysis demonstrates that the house and its setting are as an unusual and surprising presence in this part of the COM.

The fact that the entirety of the building and its setting cannot be readily appreciated from public view is not adequate justification for a heritage overlay not to be applied. Cultural significance is not dependent on whether or not a building can be seen from the street or other public viewpoint.

- *The later additions to the west of the original house are of no heritage value; the exhibited material does not substantiate how the element is ‘contributory’.*

The heritage citation explains (on page 4) that, while the new wing to the west side of the house was added in the post-WW2 era (“circa 1960s/70s”), it was conceived to be wholly sympathetic in scale, form and materials (ie, weatherboard construction, large windows and with tile-clad gabled roof). This is certainly conducive to a definition of contributory significance.

- *The proposed tree controls, which seek to apply heritage protection to as many as six trees on the land, is not justified on heritage grounds and the evidence presented does not warrant protection of these trees pursuant to HO146 (noting that there is already a Significant Landscape Overlay on the land).*

The justification for tree controls is based on specific species identified in the 1942 AHB article. This is considered adequate justification, as the magazine article provides clear documentary evidence that these trees formed part of the original landscaping scheme.

Conclusion

Based on the issues raised, Submission One concluded that “Council should abandon or heavily modify the exhibited version of the amendment”. However, I did not consider that the submission provided sufficient justification for the HO to be abandoned or modified. While it raised a number of issues that might potentially have an impact on an assessment of significance, the submission did not actually provide enough information for these matters to be considered (eg suggestions of overstated significance and factual inaccuracy without actually identifying specific examples).

C2 SUBMISSION 2 (26 JULY 2019)

The document referred to here as Submission Two is a 17pp report prepared by Lovell Chen, in the form of a “Memorandum to Council”, dated 26 July 2019. It effectively provides a review of Ms Keeble’s citation, drawing from additional historical research and comparative analysis.

While taking some issue with the contents of the citation Submission 2 conceded that the subject property at 3-5 Wonga Road “demonstrates a *prima facie* case for significance at the local level but not including all of elements/attributes identified in Council’s assessment and statement”.

Based on the supplementary historical research, which included reference to title certificates, postal directories and vintage aerial photographs, Submission B concluded that:

- While the citation states that the landscaped setting of the property was “maintained and further developed by the Turners from 1940 until its c1980s subdivision”, this can no longer be sustained with confirmation that the property was in fact subdivided as early as 1946, with the Turners subsequently building a new house for themselves at what is now 1 Wonga Road.
- The rear additions to the original house, now believed to date from the mid-1960s (with aerial photographs indicating that they were built sometime between 1962 and 1968) were therefore not added by Turners, and furthermore were not likely to have been designed by the same architect, Percy Meldrum, who had retired around that time.
- The extensive garden setting, as described in the 1942 AHB article and evident in historical aerial photographs, has been considerably altered by later works including not only the land subdivision, construction of neighbouring dwellings, and other site works. It is stated that only a small number of trees remain to provide evidence of the original setting, with only two individual specimens (of the six in the proposed schedule) recommended for inclusion.
- The stone gatepost and driveway walls to 1 Wonga Road do not represent part of the original 1940s development of the site, but are more likely to have been associated with a phase of road reconstruction in the early 1960s. This conclusion was informed by the following evidence:
 - Certificate of Title showing compulsory acquisition by CRB of land at the ‘apex’ of the site (ie the pointy bit at the corner of Wonga and Warrandyte Roads);
 - Physical evidence of retaining walls along the two street frontages (including boulder wall on Warrandyte Road) demonstrate that the site topography was substantially altered by the road widening works, necessitating reconstruction of the driveway;
 - Aerial photographs confirming that the alignment of the driveway changed between 1945 and 1968, indicative that it was reconstructed in the interim

Conclusion

I advised COM that I found Lovell Chen’s evidence compelling, and that the historical research underpinning their conclusions could not be easily discounted. On that basis, I recommended that the rear additions to the original house (which could no longer be considered as part of the Turner family’s ongoing occupation of the dwelling) should be deemed non-contributory rather than contributory, and that the stone gateposts/retaining walls of 1 Wonga Road, confirmed as dating from the 1960s rather than the 1940s, should no longer be included in the proposed HO.

On the matter of the trees, I deferred to the opinion of the Council Arborist, as I do not have the necessary qualifications to assess the significance of tree species. Ultimately, I recommended that a suitably qualified expert should be engaged to provide that assessment.

C3 SUBMISSION 3 (6 NOVEMBER 2019)

The document referred to here as Submission Three is in the form of a single-page email to the COM from the owner of 1 Wonga Road, dated 6 November 2019. The submission supported the proposed HO in its exhibited form,

The submission did not go into great detail, noting that “this property and buildings on it are a significant piece of Ringwood’s history and should be protected along with the entrance gates to our property at No 1 Wonga Rd, and should rightly be protected”. Reference was made to the current owner’s maintenance of landscaping elements, and that the front gates “are of the same ironwork as the original Thallo sign at the entrance to No 1 Wonga Road”.

The submitter appended a copy of the 1942 AHB article, a copy of a 2002 auction brochure in which the property was described as “one of North Ringwood’s landmarks”, and a press clipping from the *Ringwood Mail*, dated 19 February 1959, which provided some further historical data on the Turner family’s occupation. The latter confirmed that the Turners were then living in the second dwelling (ie, 1 Wonga Road), erected in the late 1940s after subdividing their original property, and specifically mentioned some of the landscaping elements including a “venerable Hawthorn hedge”. The article also mentioned that “widening of Warrandyte road will whittle away portion of their promontory of land”.

Conclusion

I did not consider that Submission 3 contained any information that challenged the findings of the Lovell Chen report. While the submission briefly mentioned the stone gateposts/driveway walls, no new evidence was provided to support the interpretation that the fabric did in fact date from the 1940s, rather than the 1960s as advanced by Lovell Chen.

Consequently, my final position is that I am satisfied by the revised statement of significance and citation and consider that it establishes an adequate basis for application of an individual heritage overlay to the property at 3-5 Wonga Road.

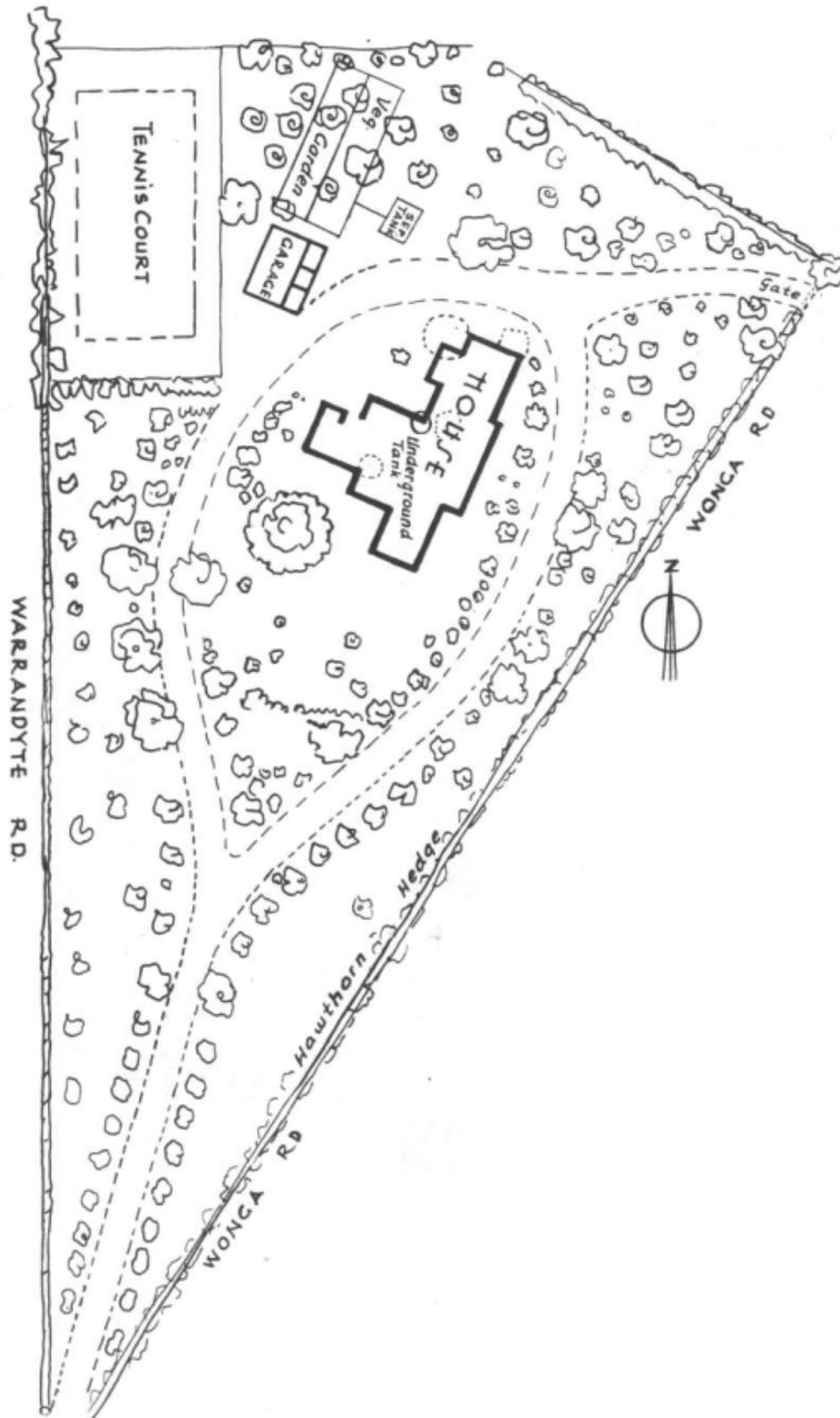
As an example of the residential work of architects Meldrum & Noad in an early modern style, the original house demonstrates particular aesthetic characteristics (*HERCON Criteria E*) while its layout, with full height windows and porches to exploit mountain views, demonstrate the principal characteristics of a dwelling in the hill station tradition (*HERCON Criterion D*). Its elevated and landscaped setting, retaining a few mature trees predating the original house, provide evidence of the historic occupation of the site by F W Parker and are of aesthetic interest as individual specimens (*HERCON Criteria A and E*).

The comparative analysis, citing only a limited number of broadly similar comparators in what is now the City of Maroondah, provides a firm basis for the conclusion that houses of this type, in settings of this type, are rare at a local level.

As such, I am satisfied that the revised citation demonstrates that the property reaches the threshold for local heritage significance in accordance with the methodologies and criteria set out in Planning Practice Note No 1 (*Applying the Heritage Overlay*).

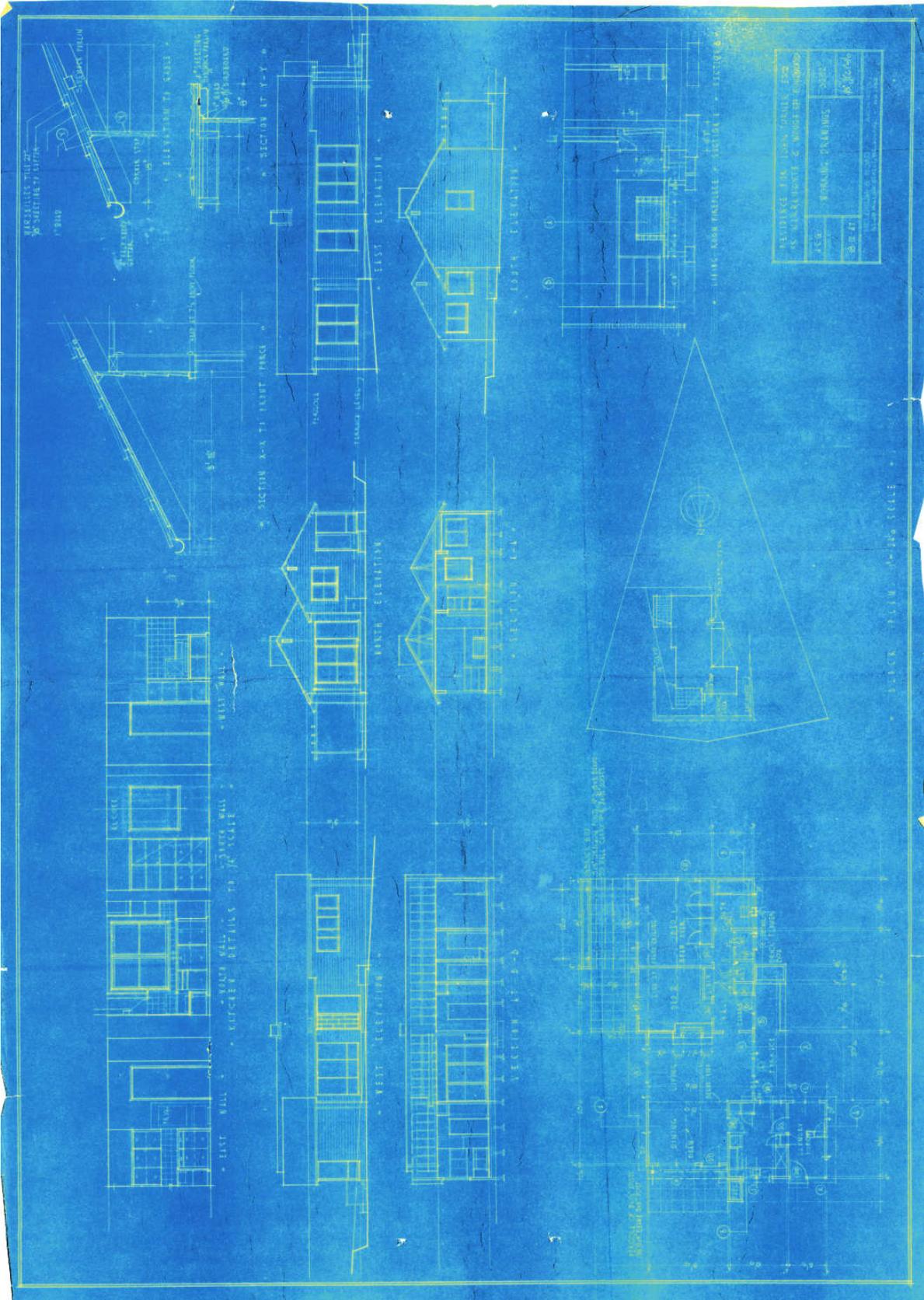
APPENDIX 1: HISTORIC PLANS

1 SITE PLAN FROM 1942 AHB ARTICLE



Detailed site plan of the property; note that entry gateposts and driveway retaining walls are not indicated

2 ORIGINAL DRAWINGS FOER HOUSE AT 1 WONGA ROAD



Original drawings by Meldrum & Noad, architects, depicting “Residence for John Turner, esquire, corner Warrandyte and Wonga Roads, Ringwood”, dated 18 December 1947. (Source: City of Maroondah)

APPENDIX 2: CURRICULUM VITAE

D1 SIMON REEVES

Qualifications

- 1996-97 Bachelor of Architecture (Hons) (University of Melbourne)
 1991-93 Bachelor of Planning & Design (University of Melbourne)

Full-time Professional Experience

- 2009- Director and principal, Built Heritage Pty Ltd
 2002-2009 Architectural historian and heritage consultant, Heritage Alliance, Melbourne
 1998-2002 Architectural historian, Allom Lovell & Associates, Melbourne

Other experience

- 2013-2017 Lecturer, *Architectural History & Theory 2: Australian Architecture*
 School of Architecture & Design, RMIT University
- 2011 Tutor, *Architectural History & Theory 2: Australian Architecture*
 School of Architecture & Design, RMIT University
- 2010 Tutor, *Modern Architecture: MoMo to PoMo*
 Faculty of Architecture, University of Melbourne
- 2010 Guest editor, *Architect Victoria* (Journal of AIA Victorian Chapter)
 Special issue on post-WW2 Heritage Places (Autumn 2010)
- 2000 Research assistant to Dr Philip Goad [Post-War Sydney Housing project]
 Faculty of Architecture, University of Melbourne
- 1999 Archivist and curator of architectural drawings (Walter Burley Griffin)
 Newman College, University of Melbourne
- 1998 Architectural historian [Stephenson & Turner archive project]
 State Library of Victoria
- 1998 Tutor, *History of Building Construction*
 Faculty of Architecture, University of Melbourne
- 1995-1998 Assistant to the Building Project Co-ordinator
 State Library of Victoria
- 1995 Teaching assistant to Jeffrey Turnbull
 Faculty of Architecture, University of Melbourne
- 1994 Research assistant to Jeffrey Turnbull & Peter Navaretti [Griffin catalogue project]
 Faculty of Architecture, University of Melbourne

Current and former affiliations

Australia ICOMOS

DocoMoMo Australia

National Trust of Australia (Victoria)

Society of Architectural Historians of Australia & New Zealand (SAHANZ)

Art Deco & Modernism Society of Victoria

Walter Burley Griffin Society

Australian Garden History Society

Robin Boyd Foundation