

trethowan

Statement of Evidence and Report to Planning Panel

Planning Scheme Amendment C341ston - 13-15 Avalon Road, Armadale

Prepared for City of Stonnington

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ARCHITECTURE
INTERIORS
HERITAGE

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1 Introduction

1.1 Instructions

[01] This statement of evidence has been prepared for City of Stonnington under instruction from Maddocks in regard to the proposal to include the subject property at 13-15 Avalon Road, Armadale, as an individual place in the Heritage Overlay (HO) as part of Amendment C341ston ('the Amendment') to the Planning Scheme.

[02] I have been asked to:

a) provide an overview of the methodology used in the preparation of the Trethowan Heritage Citation and Statement of Significance;

b) express my opinion on the Amendment, including the Trethowan Heritage Citation and Statement of Significance;

c) express my opinion on the issues raised in the submissions to the Amendment insofar as they relate to heritage matters; and

d) express my opinion on any directions issued by the Panel, as relevant to my expertise, including direction 15 of the Panel's Directions which provides:

i) Through submissions or expert reports, and where relevant to the party, the Panel would be particularly interested in:

▪ why the subject land meets/does not meet Planning Practice Note 1 Criteria A and D

▪ how the subject land compares with other comparable heritage properties

▪ why the subject land has been singled out as an individual heritage place if the building is not the original Victorian mansion and forms part of a broader subdivided estate

▪ how the subject land and content in the Statement of Significance's Why is it significant? section relate to relevant themes (as identified in the citation) of the Stonnington Thematic Environmental History (2009)

▪ whether the architect, Arnaud E Wright, should be referenced in Criterion A of the HO790 Statement of Significance if the property does not meet Criterion H (Special association)

▪ the difference between 'middle class' (see Thematic History theme 8.1) and 'affluent middle class' (see Statement of Significance)

▪ how a building and property of this scale and nature can be considered middle class for its time

1.2 Site Inspection

[03] The subject site was inspected from the street as part of the preparation of the citation in March 2024. Photographs were also consulted from previous assessments and Realestate.com. As there are no internal controls applying to this property, I did not inspect the interiors of the house or grounds, however the same sources were consulted. On 11 July I was provided with further photos by Maddocks from a site visit conducted by Kristin Richardson and others.

1.3 Sources of Information

[04] The following documents provided were consulted as part of this evidence:

Provided by Maddocks

- Former 'Ken-Ailsa' 13-15 Avalon Road, Armadale Citation Prepared by Trethowan Architecture April 2024
- Statement of Significance: Former Ken-Ailsa, 13-15 Avalon Road, Armadale, April 2024
- Amendment C341ston – All Submissions
- Stonnington Planning Scheme Amendment C341ston Explanatory Report
- C341ston Schedule to Clause 43.01 Heritage Overlay Compare

- C341ston Planning Scheme Map 5HO
- Bryce Raworth, Memorandum, April 2018
- Bryce Raworth Memorandum, August 2019
- Extent Heritage, Hampden Road Precinct (HO136) Citation, updated January 2024
- Stonnington Heritage Review Summary Report Part 2B Armadale Volume 1 – Findings January 2023 Updated January 2024
- Extent Heritage, Expert Evidence, Amendment C320ston Panel, July 2023
- Landmark Heritage, Expert Evidence, Amendment C320ston Panel, July 2023
- Lovell Chen, Expert Evidence, Amendment C320ston Panel, July 2023
- John Patrick, Expert Evidence, Amendment C320ston Panel, July 2023
- C320ston Panel Recommendations Panel Report, Amendment C320ston Panel, July 2023
- RBA Architects, Heritage Assessment, December 2023
- City of Stonnington Thematic Environmental History 2009
- Council Officer Report (20 May 2024)
- Council Meeting Minutes (20 May 2024)
- Planning Panels Guide to Expert Evidence Practice Note 1
- Amendment C341ston Directions and Timetable 12 June 2025

  Council

- Extent Heritage, Toorak, Kooyong and Armadale Heritage Review, Gaps Analysis, October 2021

  Own library:

- Richard Apperly, Robert Irving, Peter Reynolds, A pictorial guide to identifying Australian architecture : styles and terms from 1788 to the present, 1989
- Stapleton, Maisy & Stapleton, Iain, 'Australian House Styles' 1997
- Gould, Philip & Willis, Julie, Encyclopedia of Australian Architecture, 2011.

[05] A further search of the Heritage Victoria Hermes-Orion database was undertaken to capture as broad a sample as possible of comparable houses of the Old English style in the interwar period in City of Stonnington. A search was also undertaken for designs by Arnaud Wright in the municipality. Many of these examples have also been discussed in some of the documentation above.

1.4 Qualifications, Experience and Area of Expertise

[06] I have provided expert heritage advice to numerous private individuals and municipal councils for sites listed at both the Local and State level, have extensive experience working with the Planning Scheme and an understanding of the Amendment process. This includes undertaking assessments of properties at a local level and as a Heritage Advisor for municipalities. I have provided expert witness evidence before Planning Panel and VCAT in the past.[1] I have a PhD in history and a Masters in Planning. I am a full member of the Professional Historians Association (Victoria) and Australia ICOMOS.

[07] A statement of my qualifications and experience with respect to heritage and urban conservation issues is found in Appendix A to this report.

[08] As arboriculture is outside of my area of expertise, I have relied on the Patrick report in relation to the potential significance of the garden and garden landscape.

[1] This includes involvement as an Expert Witness in C320ston in relation to a set of shophouses proposed for the Heritage Overlay at 46-50 Wattletree Rd Armadale.

1.5 Involvement in the Amendment to date

[09] I have been involved in the preparation of a report that has been used to inform the preparation of the amendment or proposal, that is in providing to Council:

a) a preliminary opinion on whether the place was likely to meet a threshold of individual significance

b) and following this a full assessment and heritage citation for the property

c) response to public submissions.

1.6 Summary of Opinion

[10] I adopt the exhibited report. I continue to be of the opinion that the property meets a threshold of local significance under the proposed HERCON Criteria A and D and should be added to the Heritage Overlay.

[11] As a result of the closer photographic inspection conducted and reviewed on 11 July 2025, I would add some details to the description of the house and its landscape setting.

[12] Historically, the place demonstrates well the evolution of the designed suburb in the interwar period and the early twentieth century subdivision and redevelopment of larger estates through its architectural pedigree, location and setting on the former Avalon estate.

[13] The house compares favourably to other Significant graded properties of its class. Architecturally, it is among the most refined, prominent and well resolved representatives of the architect Arnaud E Wright's Old English revival designs from the interwar period.

2 Background

[14] In February 2024, Council officers commissioned Trethowan Architecture to undertake an assessment of 13-15 Avalon Road, Armadale in accordance with Council's resolution of 18 December 2023.

2.1 Methodology

[15] I was initially asked by Council in February 2024 to determine whether the place warranted inclusion in an individual Heritage Overlay.

[16] I was provided with the previous assessments as background material and my review of these is provided in Appendix B. Having not been involved in previous discussions regarding the potential significance of the property, I came at it with a fresh perspective and formed my own opinion based on the evidence.

[17] Having reviewed the previous reports, I visited the site, conducted historical research, and made my own comparative analysis. This analysis included comparable places already identified, and a search of the Heritage Victoria Database and HERMES database to ascertain a comprehensive range of places by the architect and residences of the style and period in Stonnington.

2.2 Establishing a threshold of local significance

2.2.1 What is a Threshold?

[18] The Heritage Victoria standard brief for heritage studies (2010) notes that local significance can include places of significance to a town or locality. Whether this 'threshold' of local significance is achieved depends upon how relevant heritage criteria are applied and interpreted. In 2006, the Minister for Planning appointed an Advisory Committee to review heritage provisions in planning schemes. Part of the scope of the review was to consider the criteria and thresholds applied in the identification of local heritage places. The subsequent report provides some guidance in considering how thresholds should be applied, understanding that this forms an integral part of narrowing down what is to be managed from the wide range of potential heritage places.

[19] On the basis that the concept of thresholds is an integral component of assessing heritage significance, the Advisory Committee concluded that the threshold for inclusion of a place in the HO in Planning Schemes should be a positive answer to the question 'Is the place of sufficient import that its cultural values should be recognised in the planning scheme and taken into account in decision-making?' (Advisory Committee Report 2007:xviii)

[20] This requires the consideration of two key elements. Firstly, there should be something to be managed, evident in the fabric of the place. Secondly, there should be a criteria for assessment, and for this the HERCON Criteria have been accepted. It is also accepted that the threshold will vary according to the comparative analysis in the locality. The municipality's Thematic History should also be considered when assessing whether a place contributes towards the significance of the municipality.

[21] In its conclusion the Advisory Committee (2007:2-40) noted that 'the issue for planning purposes is simply whether a place is of sufficient heritage note in the local context to warrant planning controls being put in place to ensure that its heritage value is taken into account when development proposals are being considered.' It concluded:

a) Essentially a 'threshold' is the level of cultural significance that a place must have before it can be recommended for inclusion in the planning scheme. The question to be answered is 'Is the place of sufficient import that its cultural values should be recognised in the planning scheme and taken into account in decision-making?' Thresholds are necessary to enable a smaller group of places with special architectural values, for example, to be selected out for listing from a group of perhaps hundreds of places with similar architectural values. Factors determining thresholds comprise another list again. They will include such things as intactness, age, rarity, and design or aesthetic quality. An important factor in the selection of places for listing will always be whether there is heritage fabric remaining in situ or other qualities pertaining to the place that are required to be managed. (2007:2-42)

[22] Thresholds are to be used to 'sieve' places identified as of some significance by the above criteria and determine those that should be listed under the HO (2007:2-44). Comparative analysis is thus crucial.

2.3 Applying the HERCON Criteria

[23] The Practice Note PPN1 outlines the HERCON Criteria that shall be used for the assessment of the heritage value of the heritage place. They are:

- 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 understanding 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).

[24] Having reviewed the previous reports, particularly the differing assessments of the Lovell Chen and RBA reports, it became clear that the potential criteria for consideration of the subject property would be Criteria A (historical), D (representativeness), E (aesthetic) and H (associative). It was clear that the house is not of a rare type as there are numerous good comparators; there was no suggestion that the house demonstrated any particular technical breakthroughs for the time, or that it was of strong social significance to a particular cultural group.

[25] It has been my understanding, and has been reinforced by various Panels, that the assessment of historical significance (Criterion A) should take place with reference to the relevant Thematic Environmental History that outlines the significant historical themes that have affected the course and pattern of the area's cultural and natural history.

[26] While aesthetic significance demands 'particular aesthetic characteristics' that can suggest a certain level of exceptionality, representative significance demands importance in demonstrating principal characteristics of a class of places.

[27] Criterion H, associative significance, has in the past been applied somewhat loosely to include association with residents or architects. However, more recently, the practice has evolved to emphasise both the importance of the individual and the special nature of the association. This means that normally, for the threshold of special association to be met, an architect should have lived in or designed the house as their own, or the house might mark an important point in their career. An example is 4 Struan Street (HO168) for its associations with the State's foremost practitioner of the inter-war Old English or Tudor revival style, Robert Hamilton, as well as preserved example of one of the first designs undertaken after becoming a sole practitioner.

3 Subject Site

3.1 Historical summary

[28] Historical research did not uncover additional information besides the generally well-documented history of the place outlined in the various reports to date. The house, originally known as 'Ken-Alisa', was constructed in 1933-4 to a design by architect Arnaud Wright for Margaret Kennedy. The MMBW Plan and aerial photographs indicate that the house is largely intact as original.

[29] The full history of the place is provided in the citation.

3.2 Description

[30] Some minor additions to the description have been made following the review of photographs from the Maddocks site visit of 11 July 2025. The subject property is a double storey Old English Revival styled interwar house. Representative characteristics of that style include the picturesque composition of the gabled wings and asymmetric composition. It has steep and prominent roofscapes and gables distinguished by flat terracotta shingles, tall angular clinker brick chimneys with corbelled crowns. The front chimney rises from a rendered shoulder with brick details and an S ornament with a recessed arch with basketweave brick detailing. The chimney is flanked by a pair of multipaned sash windows. The windows are headed by clinker brick soldier courses and brick lintels and sills. A set of three corbelled eaves project over the central section with expressed hipped roof form projecting over a diamond pane window and gabled porch. There is another diamond pane feature window at rear. The gable eaves are flush and defined by brick detailing and bell curved at the ends. The walls are rendered to imitate white limewash, with clinker brick detailing and base. On the ground level is a projecting bay window with shingle roof and mulitpane sash windows. The porch is Roman clinker brick with arched entrance and raised brick quoining with a basketweave brick floor. There is an iron lamp over the archway.

[31] At the rear of the property is a sunroom with curved glass walls and a projecting garage wing. At the side is a single storey service wing.

[32] There is a non-original pool and a games room at the rear. The games room is flat roofed and has incorporated Tudor revival references to the style of the original house.

[33] The landscaping includes sweeping driveway with crazy paving characteristic of early post-war landscaping, retaining walls and staircases within a garden setting. This includes curved raised garden beds around the front of the house. The landscaping comprising sloping driveway appears to be original (c.1930s) while the garden bed walls and stairs also appear contemporaneous with the early period of the house (c.1930s-40s).



Figure 1. Front façade along driveway. Source: Realestate.com



Figure 2. View towards front façade from above. Source: Realestate.com



Figure 3. View towards the front from garden over retaining walls and staircase. Source: Realestate.com



Figure 4. View towards the rear of house showing garage and bar room. Source: Realestate.com

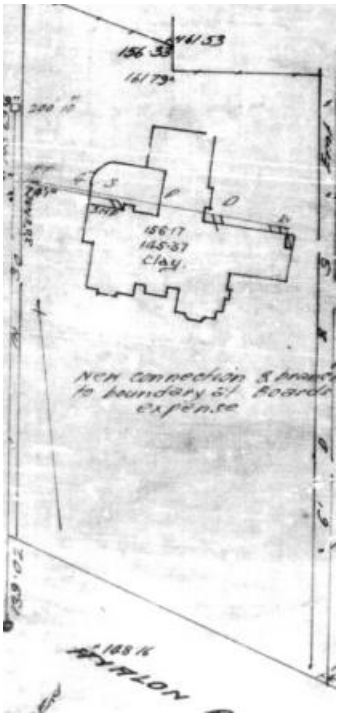


Figure 5. Detail of 1933 MMBW Plan showing original extent of the house.

4 Comparative Analysis

4.1 Old English Domestic Revival

[34] The Old English Domestic Revival style of home was among the domestic residential styles popularised during the interwar period in particular that arose out of nostalgia for 'Old England' around the Tudor period. Hence it was sometimes called Tudor Revival.

[35] Architectural historian Philip Goad describes some characteristics of the style in his Encyclopaedia of Australian Architecture:

a) *Terms such as Elizabethan, Jacobethan, Tudor Revival and Old English style would have been applied, the exactitude of the label dependent often on the chronological correctness of the detail or simply the evocation or association desired. In more distinctly domestic versions that could be seen in locations from subtropical Brisbane to temperate Hobart, elements such as half timbering, tiny terracotta roofing shingles, dark-stained adzed beans, 'medieval' finials, bottled glass, weathervanes and carriage lamps were essential additions.*

b) *The various English domestic revival styles perhaps earned their greatest popularity and criticism when explored by speculative house builders in the suburbs. One of house builder A.V.Jennings's most popular styles, frequently employed by his in-house architect Edgar Gurney, was the 'Old English': essentially a single storey house with a bungalow plan that had a projecting bay with a terracotta-tiled gabled roof, corbelled-brick gable ends to conceal the gutters behind, and a porch in clinker brick with the obligatory carriage lamp, door knocker and bottle-glass window in the front door.*

[36] Apperley outlines the background for the style historically:

a) *Queen Anne and Old English styles popularised by Richard Norman Shaw in late nineteenth century Britain became the basis for house designs by speculative builders in the twentieth century for suburbia. After World War I, these styles often moved up-market to provide instant respectability for the nouveaux riches. Australia, still with nostalgic ties to the mother country, responded readily to this influence, especially in the 1930s.*

[37] The following non exhaustive list of elements of a typical Revival Cottage Circa 1940 (late in the period) is drawn from Stapleton & Stapleton (p.80) 'Australian House Styles' (elements demonstrated in the subject house in bold). Not all of them are present in every example of the style and there are various combinations that may apply or be substituted:

- **Double fronted gable cottage form**
- **Flush gable ends exposing edges of tiles**
- **Corbelling in contrasting brickwork**
- **Art Deco motifs, often in the gable ends**
- **Imitation dressings in contrasting brickwork**
- **Porch, often with semi circular arch**
- Marseille tile roofing
- **Quaint crooked chimney**
- Leadlight window
- Brick string course
- **Bell cast eaves**
- **Wraught iron details** such as house numbers or brackets
- **Double hung sash windows**
- **Brick on edge sills**
- **Texture face brick walls** or **limewash walls**

- Painted boarded shutters

[38] In the subject property, the characteristic elements are more representative of the later period of the Old English style, particularly as practiced by Arnaud Wright. He substituted timber bargeboards with the flush brick gable ends, the Tudor with a rounded arch, and leadlight with diamond and multipaned glazing that was also common in the Tudor style.

[39] While half timbering was often a characteristic of the broader style, later in the period these came to be replaced by decorative brickwork and use of imitation limewash walls and steep roofs. Terracotta shingles evoke a more rustic appearance than the more common Marseille tile roof. The subject house also uses basketweave brickwork as a decorative detail, another substitution often made in the later iterations of the style.

[40] The examples of Arnaud Wright's work are important representations of the late interwar style that eschewed half timbering for greater use of brick detailing, rounded rather than Tudor arches, altogether presenting a more modern interpretation of the style before it went out of fashion in the post-war period.

[41] Wright's examples are also by an architect-developer, which make them important historically as representatives of this interwar connection between architectural design and speculator development of the suburbs.

4.2 Comparative Analysis

[42] A search of the Hermes Orion database returned over 30 results for interwar period Old English style houses. The comparable houses are listed below, plus Wright's Georgian Revival designs that together with the Old English designs demonstrate his oeuvre in Stonnington. The most relevant example however is another significant graded house by the same architect Arnaud Wright at 3 Myrnong Court.

[43] Arnaud Wright was a prolific local architect in the interwar period who was also involved in local developments such as the Huntingfield Road (1934) and Moonga/Power Avenue subdivisions (1930-40). These were significant subdivisions of the surviving mansion estates in the area during the period. Wright generally employed the Georgian and Old English Revival styles popular at the time. The most comparable examples of Wright's designs with their attributed dates are below. The houses were built around the same period of the mid 1930s. We do not have the architectural plans to establish the exact date of the designs, but Ken Ailsa appears to have been the earlier and possibly the prototype for the subsequent houses.

a) 13-15 Avalon Rd (the subject site) (1933)

b) 21 Power Avenue, Toorak (1934)

c) 16 Montalto Avenue, Toorak (1934)

d) 3 Myrnong Crescent, Toorak (1935)

[44] Other known houses by Wright in the Old English style include:

a) 11 Moorakyne Avenue, Malvern (1934)

b) 19 Power Avenue, Toorak (1935)

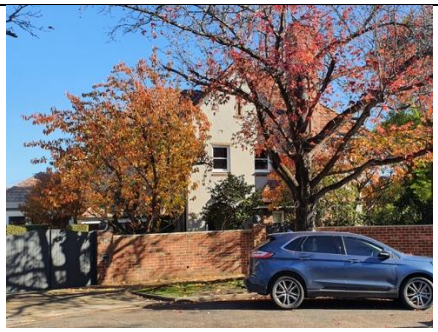
c) 1 Henderson Avenue, Malvern (1935)

[45] There are numerous houses by Wright in the Georgian revival or Mediterranean style also popular in the interwar period. The Moonga and Huntingfield estates included numerous Georgian revival houses.

[46] A tabular summary of the most comparable places is provided below. The houses are mostly drawn from the most comparable significant graded properties, however several towards the end are included to provide some comparison with houses also accorded aesthetic significance or associative significance:

Address	Image(s)	Remarks[2]
Old English Revival Designs by Arnaud Wright		
3 Myrnong Crescent, Toorak Significant (A2 graded) in HO180	 Source: Heritage Victoria  Source: Realestate.com	The house has a similar design and scale but less elaborate detailing, shorter chimneys; more modest setting, more conventional Marseille tile instead of shingle roof and simpler fascia to the gable ends without the bell curve. The house has a more modest street setting and a more prominent later addition at rear. More compressed gable roof. Altogether less well resolved architectural design. Comprable render walls with clinker brick trim (windows architraves, chimney shafts, some quoining) Rows of windows with multi-paned upper sashes. Undercroft garage rather than to the rear.
19 Power Avenue, Toorak Significant (A2 graded) in HO180	 Source: Heritage Victoria	Comparable mix of render and brick detailing, prominent roof and tall chimneys with bolder asymmetric composition. Similar arched porch form. Tall chimneys without capping.
21 Power Avenue, Toorak Significant (B graded) in HO180	 Source: Heritage Victoria	This house is almost a reverse mirror image of the subject property, however the chimneys are shorter and it lacks the grand landscape context and additional service wing. Built in 1934, occupied briefly by A E Wright himself. The house provides the closest

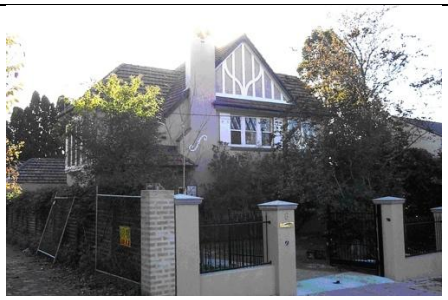
[2] Remarks on significance draw from citations and Statements of Significance from the Victorian Heritage Database. 'Architectural significance' is often used to explain the class of representative significance under Criterion D in many of these citations, as a place designed by a particular architect or to a particular style.

	 Source: Realestate.com	precedent in terms of quality of detailing (eg. gable ends with bell curves, shingle roof), however narrower allotment and so no single storey section. Comparable gable roof, shingles, patterned tapestry bricks to blind niche. Tall, faceted chimneys, narrower central, recessed bay (with single instead of triple corbelled eaves). Rows of windows with multi-paned upper sashes, though bay window is possibly altered as central light lacks sashes.
16 Montalto Avenue, Toorak Significant (A2 graded) in HO143	 Source: Heritage Victoria	Similar use of render and brick detailing, with prominent angular chimney but simpler eave and tiled roof in more modest setting.
11 Moorakyne Avenue, Malvern Significant (B graded) in HO182	 Source: Heritage Victoria	Similar in style but smaller, with shorter chimneys and tile roof. House recently has a new fence (not pictured).
1 Henderson Ave, Malvern Significant (B graded) in HO182	 Source: Heritage Victoria	Comparable gable detailing and landscaping, but much smaller. Gable roof, Marseille type tiles. Clinker brick base, rendered above, tapestry bricks to corbelling. Rows of windows with multi-paned upper sashes

Other (Georgian Revival) designs by Arnaud Wright		
7 Huntingfield Road, Toorak Significant (B graded) within HO347	 Source: Heritage Victoria	Georgian Revival house with some alterations/additions.
17 Huntingfield Road, Toorak Significant (B graded) within HO347	 Source: Realestate.com	Georgian Revival house.
5 Huntingfield Road, Toorak Significant (B graded) in HO347	 Source: Heritage Victoria	Georgian Revival/Mediterranean house.
19 Huntingfield Road, Toorak (attributed) Significant (B graded) in HO347	 Source: Heritage Victoria	Georgian Revival house.

15 Huntingfield Road, Toorak Contributory (C graded) in HO347	 Source: Google Maps	This house was graded Contributory due to 'extensive' alterations. The subject house is more intact by comparison.
618 Toorak Road, Toorak Significant (A2 graded) HO519	 Source: Heritage Victoria	Large house in the interwar Georgian revival style with Mediterranean overtones (Criterion D)
50 Hopetoun Road,Toorak Individually Significant (No letter grading – added 2014) HO499	 Source: realestate.com	Built in 1935, the property was created through subdivision of land at the rear of a large villa named Myvore, which was built c1902 on land originally forming part of the Grosvenor mansion estate. The house has been accorded architectural significance as a representative Georgian revival style residence (Criterion D). It is similarly impressive and intact an example as the subject property while of a different style. This house, while of a different style, is comparable in scale and setting and in the application of the criteria and relationship to the historical themes. The end of an era - mansion estate subdivisions in the twentieth century, Houses as a symbol of wealth, status and fashion (Criterion A).

Selected other interwar Old English Revival houses		
28 Albany Road, Toorak Significant (A2 graded) HO486	 Source: Heritage Victoria	1934 to designs by the noted architectural firm Irwin and Stevenson English Revival residence (Criterion D) presents similar use of render with brick detailing, bay windows, shorter chimneys, more modest setting. No half timbering.
46 Heyington Place, Toorak Individually Significant (A2 graded) HO495	 Source: Heritage Victoria	The large double-storey English Domestic Revival style house at 46 Heyington Place, Toorak was constructed in 1933-1934 to designs by architect Stuart Calder. It was built on land subdivided from the grounds of the nineteenth century mansion Tyalla. English Revival residence (Criterion D) presents similar use of render an bold gabled roof forms with more minimal detailing and less elaborate chimneys in a more modest setting. No half timbering.
407 Glenferrie Road, Malvern Individually Significant (A2 graded) HO525	 Source: Heritage Victoria	Old English style house constructed c1934 to designs by accomplished interwar architect A Mortimer McMillan design, Mindai is architecturally significant as a large, skilfully designed and highly intact Old English style residence (Criterion D). The richness of its Medieval inspired detailing and complex articulation of hips and gables exemplifies the picturesque romanticism of the Old English mode (Criterion E). Comparable angular chimneys with corbelled crowns to the subject property.

8 Monaro Road Malvern Individually Significant (A2 graded) HO277	 Source: Heritage Victoria	The house built in 1930 was accorded architectural significance as one of the early group of published architect designs in the suburban Old English manner which was to be popularised in the middle suburbs during the following decade. (Criterion D). It has an articulated facade with intricate detailing demonstrating architect A Mortimer McMillan's talent for design in this mode. More modest than the subject property in scale, less prominent or decorative chimneys. Half timbering in the gable ends, similar iron S detail on chimney breast. Fence is new.
2 Ledbury Court, Toorak. Significant	 Source: Heritage Victoria	The house is architecturally significant as an impressive and largely intact Old English style residence (Criterion D). The imposing street facade is noteworthy for its strong gables and austere brick surfaces with a more elaborate half-timbered gable accentuating the entry (Criterion E).
4 Struan Street, Toorak HO168, Significant	 Source: Heritage Victoria	The house is a superb and externally well-preserved example of Old English style, from 1923, 1932, showing strong links to the style's origins, as in the work of CFA Voysey and Norman Shaw (Criterion E) -for its associations with the State's foremost practitioner of the inter-war Old English or Tudor revival style, Robert Hamilton, as well as preserved example of one of the first designs undertaken after becoming a sole practitioner (Criterion H)

4.3 Discussion

[47] The subject property is an architect-designed house, by Arnaud Wright. Wright left a significant mark on the municipality with several high quality designs in a similar Old English Revival idiom. The house stands out as a high-quality design, incorporating important elements of his style that appear across the architectural oeuvre. It is distinguished by its scale, siting and particularly prominent chimneys and terra cotta shingle (rather than Marseille tile) roof. Many of Wright's designs that were previously B graded have since been deemed Significant within their HOs.

[48] There are a great many Old English Revival styled houses of the interwar period in Stonnington. The former letter gradings used in Stonnington are in the process of being formally rationalised to use Significant, Contributory or Non Contributory suburb by suburb (refer to Part A Submission p.19-20). The subject property was formerly graded B. Despite its former B grading, I would argue that the house compares well to A2 graded examples such as 28 Albany Road and 46 Heyington Place in terms of predominant use of render and brick decorative elements, multi-pane windows, shingle roofs with prominent gables and chimneys. It also compares well to a number of houses (formerly A or B) that have been graded Significant under the updated grading system. Council's local heritage policy explains that A1, A2 or B graded properties are regarded as being 'significant', and it is C graded properties are regarded as being 'contributory' until the letter gradings have been formally reviewed for each suburb.

[49] The subject property is as good as numerous significant graded properties on the HO in terms of expressing the Old English idiom in the interwar period. It is distinguished as a fine example by its use of roof shingles, fine tall chimneys, scale and siting on its block within a terrace landscaped garden setting. While the house does not have half-timbering, not all significant Old English houses demonstrate this element and it appears that this use of render and brick detailing was a hallmark of Wright's interpretation of the style consistent with his other designs.

[50] Among Wright's other known extant houses in the municipality, the subject property stands out as a particularly fine and accomplished example. It is the subject property rather than 3 Myrnong Crescent that is the more elaborate and elegant of the two aesthetically and a finer representation of the interwar Old English Revival style.

[51] Its historical association with the development of the area and its estates by interwar architects such as Wright is particularly strong given its location on the site of the former estate. In this respect it compares well historically to 50 Hopetoun Road which, though different in style, is similar in scale and siting on a former Victorian estate.

[52] The house is as good as many of the houses on the HO and better than some, including 3 Myrnong Court in terms of its aesthetic and architectural qualities and overall intactness and setting.

[53] While it is acknowledged that some places surpass the subject property in exhibiting the Old English Revival style, a place does not have to be better than all other places on the HO to meet a threshold of significance. To meet Criterion D at the local level, a place needs to be better than typical of its class (C320ston Panel Report, p.193).

[54] Several features mark the property as better than typical – its scale; detailing, particularly of the flush bell cast eaves and tall detailed chimneys; its landscape setting and its particularly fine representation of the notable local architect's oeuvre compared to his other designs. Equally, Ken-Ailsa surpasses some other Signficant graded properties, including some of the Significant graded examples by the same architect.

[55] Those buildings that surpass the subject property such as Mindai and 2 Ledbury Court, tend to have additional significance beyond representative or historical significance, such being significant according to Criterion E (aesthetic significance) in exhibiting particularly outstanding aesthetic qualities.

5 Assessment

5.1.1 Integrity of the subject property

[56] The house appears to have a high degree of integrity to its original design on the exterior. The plan of the house is similar to the original, with minor additions such as the garden room and pool.

5.1.2 Historical Significance

[57] The Thematic History of the City of Stonnington outlines the significant historical themes that have influenced development in the municipality.

[58] This place is clearly associated with the following historic theme(s) taken from the Stonnington Thematic Environmental History (2009):

- 8. Building Suburbs
- 8.1.3 The end of an era – mansion estate subdivisions in the twentieth century
- 8.2 Middle class suburbs and the suburban ideal
- 8.4 Creating Australia's most 'designed' suburbs
- 8.7.1 Creating leafy suburbs

[59] The introduction to Section 8 outlines the theme of building suburbs in the municipality, highlighting the significance of high status homes and their identification with prominent design and siting. The situation of the subject house on high ground, the location of the former Victorian mansion, represents well the continuity of this theme through subdivision and interwar development.

a) *8.4.1 Houses as a symbol of wealth, status and fashion. The architects built predominantly in the fashionable architectural styles of Toorak in the 1920s and '30s, which were Georgian Revival and Old English. As we have seen, the latter was the style used on the shops at Toorak Village to capture the romantic atmosphere of an English village. The work of Robert Hamilton, whose charming Denby Dale apartments (424 Glenferrie Road) epitomise the Old English style, was much in demand.*

b) *This chapter specifically considers the residential buildings associated with the development of suburbs and examines how wealth and social status were reflected in the design and siting of houses, creating neighbourhoods often 'cheek by jowl', but often with vastly different characters. as we have seen in chapter 3, from the earliest time of settlement, the more desirable higher ground was claimed by upper and middle class residents, leaving the less-desirable (and often flood-prone) lower reaches to workers' housing and industry. (p.122)*

c) *After the collapse of the boom, many mansions were put to other uses, subdivided or demolished. Sometimes, as in the case of the Miller family's Glyn (Kooyong road) or the Gurner family's Glyndebourne, mansions were rebuilt in a more modern style. (p.124)*

d) *From quite early on large estates were beginning to be subdivided, leaving the mansion surrounded by an acre or two of garden. (p.124)*

e) *Often the mansion survived the first subdivision round, only to succumb to demolition in a later subdivision, as did Moonga. Similar patterns were repeated throughout Toorak and other parts of the study area during the twentieth century, and can now be seen in the variety of housing styles representing the different eras in which the estates were subdivided. (p.125)*

[60] Besides demonstrating the way in which Victorian mansion estates were subdivided and original homes rebuilt in the new style, the house also demonstrates the continued culture of architect design which is another important theme in Stonnington's history:

a) *This chapter also considers the way the physical fabric of the residential properties represents the lifestyles of the wealthy and middle class, and explores the strong tradition of patronage of leading architects by wealthy residents. The list of architects whose work is represented in the study area reads like a 'who's who' of Australian architectural practice. (p.122)*

b) *The architects built predominantly in the fashionable architectural styles of Toorak in the 1920s and '30s, which were Georgian revival and Old English. As we have seen, the latter was the style used on the*

shops at Toorak village to capture the romantic atmosphere of an English village. The work of Robert Hamilton, whose charming Denby Dale apartments (424 Glenferrie road) epitomise the Old English style, was much in demand. (Theme 8.4, p.135)

[61] 'Middle class' is a very broad term, particularly in an age when almost everyone sees themselves or aspires to it. I have used the adjective 'affluent' to describe the particular character of the middle class in the area to distinguish them from a broader middle class. That is, the kind of middle class people who were dentists, race horse owners, who might afford to build a 'high status' large house across two lots on a commanding and particularly prestigious site. These were, nonetheless, suburban houses distinct from the very grand and expansive Victorian estates that characterised the 'upper class' mansions with aristocratic pretensions.

5.1.3 Representative Significance

[62] To meet a threshold of significance at a local level, the property should demonstrate a high degree of integrity and representativeness. This is clearly the case in this example. As outlined in the Comparative Analysis, it compares well to significant representatives of Wright's and Old English revival houses in Stonnington and is strongly representative of Wright's interpretation of the style. The list of representative characteristics demonstrated by the house include:

- prominent gables with slit brick details,
- steep roof forms with terracotta shingles,
- tall brick chimneys with corbelled brickwork,
- decorated external chimney breast including 'S' detail,
- flush gable ends
- bell cast eaves
- corbelled gable eaves,
- combination of imitation lime wash walls with clinker brick detailing,
- diamond and multi pane windows,
- bay windows with roofs,
- arched doorway with gabled porch.
- double hung sash windows
- brick on edge sills
- porch with arch
- basketweave brick details

[63] It is distinguished among Arnaud Wright's Old English designs by its large scale and spacious garden setting with curved driveway, tall chimneys and terracotta shingle roof with finely detailed eaves. The house does not display half timbering details, however from the comparative analysis this appears to have been a characteristic of Wright's interpretation and application of the style, instead using brick, particularly the clinker brick fashionable at the time, to provide visual interest and decorative details to the gable ends and corners in particular.

[64] The importance of the house as a representative of the style is established by its particularly well resolved and fully detailed design on a par with the other Significant graded house at 21 Power Avenue, incorporating terracotta shingles, with flush and detailed gable ends.

[65] The house is larger than 21 Power Avenue and in a more imposing position and fuller garden setting. While the fabric of the landscape has been altered in the post-war period, the scale, position and setting of the house within a garden nonetheless contributes to its importance.

[66] It also appears to have been the first of this series of similar houses to have been completed and may have served as the prototype for subsequent designs. It certainly presents as the most 'complete' and grandest of the group. As an Old English revival style house of the interwar period in general, the importance of the house rests both in its combination of representative elements listed above, and as the best example of the houses in the style designed by one of its significant practitioners in the municipality.

6 Response to Submissions

[67] Thirteen submissions were received during the public consultation period. Eleven of these were supportive of the inclusion of Ken-Ailsa in the Heritage Overlay. One was out of scope and the other objecting. Detailed response to each of the submissions was provided in the Officer Report that was informed by my responses. My responses are provided in Appendix C.

[68] Supporters of the nomination generally supported the historical and representative significance ascribed to it by the citation.

[69] Submitters also praised the aesthetic qualities of the house, its prominence or 'landmark' quality and its contribution to the heritage streetscapes of Stonnington more broadly.

[70] In my opinion, the aesthetic qualities valued by the community may be adequately captured under the representative significance of the house as an architect designed Old English interwar house. I did not assess its 'landmark' quality against other 'landmarks' or the contribution to the local street as I was looking only at its potential individual significance as a house of its class. In my view there are likely to be more prominent landmarks on a municipal scale, such as town halls, church spires or similar.

[71] One submitter mentioned the pool as potentially historic as an early pool. Assessing this would require a broader historical study of private pools in the municipality. As the pool is a later addition, I did not consider it so intimately connected to the original house or interwar design to be given significance. The same may be said of the other later outbuildings.

[72] The objecting submission argued that Panel found insufficient justification for the application of an individual HO during C320ston and that previous heritage assessments did not recommend the property as significant for various reasons.

[73] Panel's recommendations were in relation to the proposed precinct extension with the house as a contributory property. Panel only commented in the context of that discussion that "[t]here is insufficient justification for the application of an individual Heritage Overlay to 13-15 Avalon Road" on p.45 C320 of the panel report. While there may have been insufficient justification provided to Panel at the time, the documentation for this Amendment and the Citation has addressed this by providing a comprehensive comparative analysis of the property against others of its class, particularly other significant houses by the architect.

[74] The issues faced by the C320ston Panel were (p.41):

- Whether the properties at 13-15 and 17 Avalon Road should be included in the Hampden Road Precinct (HO136)
- the Statement of Significance is appropriate.

[75] Expert evidence provided to Panel at that time was similarly focused on the potential Precinct extension and Panel was not presented with expert evidence focused solely on the potential individual significance of the house based on a thorough comparative analysis with places of its class. This has been remedied by the exhibited Citation and the analysis based on a broader range of comparable examples.

[76] I reviewed and considered previous assessments and reached my own conclusion regarding the significance of the place based on the comparative analysis and HERCON criteria. My opinion is that some previous assessments have not compared the place to enough comparable places of its class, that is interwar houses by the architect currently protected on the HO and interwar Old English style houses significant for HERCON criteria A and D. The house compares favourably to these. I have included my review of these previous assessments in Appendix B.

7 Response to Panel Directions

7.1 Why the subject land meets/does not meet Planning Practice Note 1 Criteria A and D

[77] This question is dealt with in the Citation and in the analysis above, particularly Section 5.

7.2 How the subject land compares with other comparable heritage properties

[78] This question is dealt with in the Citation and comparative analysis above, particularly at Section 4.2.

7.3 Why the subject land has been singled out as an individual heritage place if the building is not the original Victorian mansion and forms part of a broader subdivided estate

[79] It is acknowledged that the house is not the original Victorian mansion. The historical significance of the place is not as an intact Victorian mansion, but rather as an interwar house relating to the historical themes of designing suburbs and the subdivision of those mansion estates, as outlined in Section 5.1.2.

7.4 How the subject land and content in the Statement of Significance's Why is it significant? section relate to relevant themes (as identified in the citation) of the Stonnington Thematic Environmental History (2009)

[80] The relationship between the citation and the thematic history is outlined in Section 5.1.2.

7.5 Whether the architect, Arnaud E Wright, should be referenced in Criterion A of the HO790 Statement of Significance if the property does not meet Criterion H (Special association)

[81] It is my understanding that the house is associated with Arnaud E Wright as one of his designs, and historically. The property does not meet Criterion H not because there is a lack of association, but that the association is not special enough as explained in Section 2.3 (p.5).

7.6 The difference between 'middle class' (see Thematic History theme 8.1) and 'affluent middle class' (see Statement of Significance)

[82] Section 5.1.2 p.32 explains my use of 'affluent' as an adjective to describe the kind of middle class people who aspired to high status, architect designed homes that were nonetheless more affordable (of the type offered by developers like Wright).

7.7 How a building and property of this scale and nature can be considered middle class for its time

[83] The building is certainly on the upper end of the 'middle class' spectrum in terms of scale and design, located on a double lot in a prominent position. It is not, however, quite in the same class of buildings as those designed by the independently wealthy or 'upper class' in the Victorian or interwar period – houses that retained very large estates and more distinctive or particular aesthetic features. Little has been gleaned from history about its original owner, but she does not appear to have been particularly prominent. Wright's designs are very much aspirational middle class in terms of their modularity and representativeness, repeating particular forms and details. To some extent the term 'middle class' is a subjective one, but I have used the term to include the professional and capital owning *bourgeois* middle class who played such a prominent role in creating the suburbs in Stonnington in the period.

8 Conclusion and Declaration

CONCLUSION

[84] For the reasons outlined in the sections above, it is my opinion that the house at 13-15 Avalon Road, Armadale meets a threshold of individual significance for the two nominated HERCON Criteria A and D.

[85] The house represents well the historical theme of Building Suburbs. As an architect-designed residence, the house demonstrates the way in which some of the most 'designed suburbs' (Theme 8.4) were created in the municipality. It also demonstrates well the way in which numerous Victorian mansion estates were replaced in the twentieth century by more modern but high status houses for the affluent middle class. Arnaud Wright was a notable architect and developer connected with this historical theme and the house illustrates well the combination of architectural design and speculator development that was a significant feature in history of suburban redevelopment in Stonnington.

[86] The house represents well the type of Old English revival house of the interwar period and is an important example of the architectural design of Arnaud Wright, a significant practitioner of the style in Stonnington who was among the architects and developers that shaped the heritage character of its suburbs. The house compares well to, and is in some cases superior in scale, situation and detailing, to other houses by Wright on the Heritage Overlay.

DECLARATION & CONFIRMATION

[87] All avenues of assessment and considerations relevant to the proposal have been identified and accommodated in this report. No questions were raised that fall outside my expertise and I conclude my report is complete and accurate to the best of my abilities.

[88] 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.

[89] I confirm I will be alone in the room from which I am giving evidence and will not make or receive any communication with another person while giving my evidence except with the express leave of the Panel. I will inform the Panel immediately should another person enter the room from which I am giving evidence. During breaks in evidence, when under cross-examination, I will not discuss my evidence with any other person, except with the leave of the Panel. I will not have before me any document, other than my expert witness statement and documents referred to therein, or any other document which the Panel expressly permits me to view.

Declared & confirmed by



Dr Aron Paul M.ICOMOS

Trethowan Heritage

aron@trethowan.com.au

9 Appendix A: Qualifications

Senior Heritage Consultant

Dr Aron Paul

EDUCATION	**Master of Social Science (Planning & Environment) RMIT, 2012**	
	Doctor of Philosophy (History) University of Melbourne, 2004	
	Bachelor of Arts (Honours in History) University of Melbourne, 2000	
POSITION	**Heritage Consultant**	**Trethowan Architecture 2017-Current**
	Heritage Consultant	**Context Pty Ltd 2011-2012**
	Associate Lecturer	**La Trobe University, 2005-2009**

EXPERIENCE

Aron joined Trethowan Architecture in 2017. He entered the heritage industry in 2001, when he completed his first Thematic Environmental History for the Mitchell Shire Heritage Study, working with Lorraine Huddle, David Rowe and Authentic Heritage. Aron has since been involved in the broader identification, assessment and planning recommendations of these studies. He has delivered expert witness statements and worked as part of consultant teams in creating Conservation Management Plans and delivering heritage advice. Aron assisted Lorraine Huddle on a range of heritage projects including the Greater Geelong Heritage Register, Moira Shire and Golden Plains Heritage Studies.

Aron graduated with a PhD in history from the University of Melbourne in 2004. After working in the university sector for several years, he returned to heritage, working for Context Pty Ltd for two years over 2011-12. He graduated with a Masters in Planning and Environment from RMIT in 2012.

He has since provided a range of heritage advice and Heritage Impact Statements for private clients at the local government level and as a contractor for architects including Trethowan Architecture, working on state as well as local level assessments and nominations.

Aron has completed a range of commissioned history publications. His history of St Kilda Community Housing, *Room for Everyone* was commended by the Royal Victorian Historical Society's 2013 Community History Awards. He has also lectured in the School of Architecture at Deakin University delivering the course, 'Urban Perspectives' 2015-2020.

Aron has provided expert witness reports to VCAT, Planning Panels Victoria and the Heritage Council.

SELECTION OF WORKS

Cultural Mapping for Gunditj Mirring Traditional Owners Aboriginal Corporation & Parks Victoria, Southwest Landscape Management Plan for Context Pty Ltd and Parks Victoria

Rural City of Wangaratta Heritage Review

Yarriambiack Shire Heritage Study Stage 1

City of Banyule Ivanhoe and Eaglement Heritage Survey and Review

Mornington Peninsula Shire Thematic History Review & Edit

Parks Victoria River Red Gums Parks Land Use Histories for Context Pty and Parks Victoria

City of Hobsons Bay Altona Precinct 15 Community Consultation and Heritage Assessment

City of Knox Heritage Advice with Context Pty Ltd

Buloke Shire Municipal Strategic Statement review

Nillumbik Shire Yan Yean Road Duplication Planning Panel Expert Witness Report

Wild Horses in the Barmah Forest Report written for Context Pty Ltd and Parks Victoria in

Thematic History of Fawkner Memorial Park written for Context Pty Ltd

Camberwell Masonic Temple Nomination to Heritage Victoria, for Trethowan Architecture

City of Boroondara Heritage Gap Study place assessments with Context and Trethowan Architecture

City of Boroondara Statutory Heritage Advisor

Arts Centre Melbourne, Victorian Heritage Registration Amendment & Revisioning Heritage Advice

Royal Melbourne Showgrounds Master planning, Heritage Advice

Royal Society of Victoria Conservation Management Plan

Shire of Nillumbik Heritage Gap Study Stage B

City of Yarra Cremorne Enterprise Precinct Built Form Heritage Guidelines

City of Greater Bendigo Victorian Miners Cottages Heritage Study Stage 2

St Kilda Botanical Gardens Eco Centre Heritage Impact Statement

City of Port Phillip, South Melbourne Heritage Gap Study Stages 1 & 2

City of Port Phillip, Port Melbourne Heritage Gap Study Stage 1

10 Appendix B Review of Previous Assessments

10.1 Review of Previous reports

[90] Bryce Raworth and Martin Turnor provided a very brief Memo of Advice to Council in 2018 that suggested the subject property was not as significant as the "broadly similar (if not slightly more elaborate)" house designed by Wright at 3 Myrnong Crescent. It then went on to compare the subject property to several of "the finest examples" of the English Domestic Revival styled houses in Stonnington such as 20 Heyington Place and others with "notably eclectic detailing showing Mediterranean and German Baroque influences." The Raworth memo relied on a single partially obscured view of the house from the street and fairly low quality oblique aerial photography. It concluded that "the house at 13-15 Avalon Road is a conventionally designed, representative example of a large interwar dwelling in the English Domestic Revival style" but that it "belongs to a category of heritage buildings that would normally only warrant protection if they formed part of a precinct". This suggests it was more comparable to Contributory graded properties rather than to Significant ones.

[91] I was not convinced by the 2018 Raworth & Turnor memo to place a heavy weight on its conclusions given their preliminary nature and context and the reliance on relatively poor imagery to make a comparison with a single other Wright house. The other houses used in the comparative analysis seemed to be of a quite different class of 'unconventional' examples of the style or aesthetically outstanding. There was also little consideration of potential historical significance, focusing purely on the aesthetic characteristics.

[92] Martin Turnor provided another Memo of advice assessing the potential significance of the house the following year in 2019, presumably arising from their suggestion that the house could be graded Contributory. The advice addressed the question of "whether the house at 13-15 Avalon Road could be included in an existing heritage overlay precinct." Turnor formed the opinion, later affirmed by Panel, that the house was too isolated from the existing Precinct streetscapes. As this addressed a separate question to the potential individual significance of the house, I did not place a great weight on this.

[93] In the Armadale Heritage Review (2023-24) Extent Heritage went on to propose an updated Citation and boundaries for HO136 that included the subject property as a Contributory graded property within the Precinct (Updated January 2024). The proposal sought to combine elements of the historical Avalon and Namarong estates and to locate the subject property within the "visually cohesive residential streetscape".

[94] The Precinct appeared to be extended around the corner into Avalon Road to capture the subject property, which I consider an unusual approach for a single supposedly Contributory graded house in a neighbouring street. The house was described as:

a) *Another notable c.1930s Interwar Old English style residence is located at 13-15 Avalon Road, also known as Tudor Lodge. The property is located on one of the largest remaining land holdings in the suburb. The substantial two-storey residence is a prominent building on the street, set amongst mature trees within a generous terraced garden and sweeping driveway. The rendered brick building is characterised by prominent open gable projections, contrasting brickwork corbelling, a steep pitched roof and tall chimney stacks. Other defining features including the gable front entrance porch, bay windows and open face brick motifs further emphasise the design style.*

[95] Though these descriptors suggest a house that is more than typical, there was no indication that Extent had assessed the potential individual significance of the house at that time in terms of any detailed or comparative analysis, so I did not place a great weight on it in that regard.

[96] During C320ston, several experts provided further or updated advice and I was provided with their Expert Witness Statements to review.

[97] Natica Schmeder of Landmark Heritage (16 July 2023) provided information that the house at 13-15 Avalon Road had been identified by the Context study (2010) as a place of potential individual significance historically and architecturally. Schmeder provided a broader and more detailed comparative analysis than those to that date, including closer comparison with other Significant Wright houses such as 3 Myrnong Crescent. She concluded (page 25) that:

a) *I conclude from my more detailed comparative analysis that the subject house is of an architectural quality equivalent to the A2-grade houses at 19 Power Avenue and 16 Montalto Avenue, and far superior in its setting to all of them. It also shares fine and intact detailing with the much more modest houses at 1 Henderson Avenue and 11 Morookyne Avenue, which are proposed to be (individually) significant.*

b) *It is also very telling that the two most similar comparators are either already formally recognised as significant in their own right (3 Myrnong Crescent), or is recommended to achieve this status (21 Power Street [sic.]), and that both of these comparators are smaller and have a far less significant setting – suburban blocks as compared to one of the largest residential landholdings in Armadale.*

[98] This has since been adopted in Amendment C320, affirming that 21 Power Avenue is Significant.

[99] Schmeder supported the extension of the Precinct on the basis that the Significant property would thus be captured within it as part of the Amendment.

[100] Peter Lovell of Lovell Chen (July 2023) appearing as expert witness for the property owner, considered that the house was "a handsome, if conservative design" but that "It is not a design which stands out amongst a number of more highly graded examples of the application of the style" and as such was not Significant whether in or out of a Precinct.

[101] The Lovell Chen and Landmark reports provided a more thorough history and detailed description of the house than had previously been done, and included a number of other Wright designs as comparators. For this reason, I gave these reports more weighty consideration. I did not give much weight to the discussion in relation to the potential extension of the Precinct, which was the principal matter for that Panel to determine.

[102] Lovell provided six Wright houses as comparators but the specific analysis against them was more cursory than that provided by Schmeder. In section 4.2.3, Lovell provided an assessment of the house against HERCON Criteria A, D, E and H that provided a clearer picture of his reasoning.

[103] Under Criterion A, he reasoned (p.38) that:

a) *The history of the construction and occupation of 13-15 Avalon Road to the extent that it has been researched presents as typical of such a residence in what historically have been the wealthier areas of Stonnington. Families/individuals of greater or lesser prominence have occupied the house for varying periods of time. With the possible exception of Mrs Margaret Kennedy, the first named occupant and owner of the house, the house physically offers no insight into the individuals who lived there, nor is it demonstrative of any particular association.*

[104] Under Criterion D, he reasoned (p.39) that:

a) *As identified with a class of places 13-15 Avalon Road presents as an example of an Old English revival style residence (the class) within the broader place type of interwar housing. In exhibiting the features which evidence this class of place it is a building which presents with subtle asymmetrical massing, prominent gables, feature brickwork, flat terracotta tile roof, tall ornamental chimneys and feature glazing. In exhibiting these features, it is also evident that it is not a building which contains the more strident features of the style, including extensive decorative brickwork, half timbering or elaborate asymmetry and complex roof forms. It is in this regard a design which is relatively undistinguished as compared to others within Stonnington, albeit still a competent and intact example. As also relevant to this criterion, the garden setting which provides a generous setting for the house contributes to the overall composition, albeit a garden in which the soft landscape presents as of more recent origins. In this regard 13-15 Avalon Road demonstrate the principal characteristics of the application of the Old English style in the interwar period but not at a level which elevates the place to one of individual significance.*

[105] I did not find the reasoning under Criteria A and D to be persuasive. In terms of historical significance (Criterion A), Lovell's reasoning appeared more concerned with associative significance (Criterion H). Historical significance may be attached to a place not simply because it is associated with an individual, but with a significant local historical theme, as expressed in the Thematic History for the municipality. That is, it may be enough for the house to demonstrate well its association with a historical theme rather than a named individual. As such, the assessment did not relate the potential significance to the historical themes of the City of Stonnington.

[106] In relation to Criterion D, Lovell acknowledges that the "class" of house is as an example of an Old English revival style house and that the house ticks off key characteristics of this style including "subtle asymmetrical massing, prominent gables, feature brickwork, flat terracotta tile roof, tall ornamental chimneys and feature glazing". However, he reasons that it does not achieve a threshold of significance because it lacks the "more strident features of the style" and that it is "undistinguished". I would locate that reasoning as generally being more relevant to Criterion E, aesthetic significance that demands 'particular' aesthetic character.

[107] Again in relation to Criterion E, Lovell critiques the house for not being distinctive enough compared to aesthetically outstanding houses of the style that "excel in the application of the style in their complexity and sophistication". Instead, the house is critiqued for being overly representative of Arnaud Wright's application of the style. In my view, this is something that might be of more relevance to support its representative architectural significance under Criterion D.

[108] Overall, in relation to Criterion E, I found Lovell more persuasive where the house was compared to more 'strident' examples of the style in houses that have been singled out for their aesthetic significance in terms of individual distinction and design in Stonnington. In my view Lovell was correct in analysing the house to be highly representative of the way in which Wright applied elements of the style to various residences depending on the particular circumstance.

[109] However, in my view, the way in which the houses were designed using combinations of repeated and representative forms and details provides some additional insight, historically and architecturally, into the way in which builder-architects like Wright could appeal to the combination of pretension and budgetary concerns of the interwar middle class residents of the area who, while affluent, often had more constraints than the owners of the grand Victorian estates whom they were replacing. The representative nature of the house tends therefore to reinforce the significance of Criterion D even as it may make the house less individually distinctive or 'particular' under Criterion E.

[110] In relation to Criterion H, I agree with Lovell that there appears to be "no special association which arises from his involvement in the design and construction of 13-15 Avalon Road", as a special association would normally be such a special one such as having lived in it as his own home. I was less convinced by the assertion that Wright was not of importance to Stonnington given the prominent role he played in such developments as documented in the history and the relatively high number of extant works for an individual architect. However again, this would best be discussed under Criterion A, historical significance in connection with the historical themes.

[111] In comparing the Schmeder and Lovell expert witness reports, I found Schmeder to be the more compelling in terms of offering a more detailed comparative analysis with places of the same class and the application of a threshold of significance that was reasonable. That is, a place should be as good as others of its class on the Heritage Overlay. It does not need to be better than all others. This is particularly relevant when discussing historical or representative significance where a place is demonstrating the principal characteristics of a class or importance to a pattern. It is natural in these cases for there to be repeated forms or elements on display.

[112] Michelle Bashta of Extent Heritage also provided an expert witness report to C320ston that revised Extent's position in response to Submissions and Landmark's assessment. Bashta conceded that the Precinct should not be extended to capture the subject property. She then went on to recommend that the house not be added to the Heritage Overlay, on the basis that while it was "a good example of an Old English Revival design", it was "not at a level that distinguishes it from more impressive examples within the municipality." Bashta listed many examples of Wright's work and the Old English style in Stonnington. I was less persuaded by this opinion given that there was not a detailed discussion of the particular comparisons explaining why the subject property did not compare well to these, or again of the relevant historical themes.

[113] There may be "more impressive" and "exceptional" houses within Stonnington, however while the threshold for Stonnington is indeed a high one compared to some other municipalities, exceptionality is not the correct threshold of significance to apply in any case, or there would be very few houses indeed on the Heritage Overlay. Again, exceptionality might have some merit in considering the aesthetic significance of an individual design, but certainly not on representative or historical significance. For representative significance, it is enough to establish the 'importance' of the example in demonstrating principal characteristics of a class.

[114] Following the Panel hearing for C320ston, the Stonnington Heritage Group commissioned RBA to provide a cultural heritage assessment of the subject property.

[115] RBA reviewed the previous assessments and conducted its own comparative analysis of Arnaud Wright's 'Tudor Revival' (another term for the Old English revival style) designs in Stonnington, concluding that:

a) *Relative to this Tudor Revival style group, the subject place is the largest/grandest and most distinguished example of Wright's work. It is differentiated by its taller chimneys, more varied roof form (interplay of volumes), and wide allotment that allows for a more spreading form. In terms of the material palette, the terracotta shingles and possibly more extensive use of Roman/tapestry bricks highlight the*

additional detailing employed here than most of his works and comparable to some of the other individual similar HOs in the area.

[116] RBA drafted a Statement of Significance for the place on behalf of the Stonnington Heritage Group (29/11/23), based on its assessment for significance under HERCON criteria A (historical) and E (aesthetic).

[117] Combined, the Lovell Chen and RBA reports present a comprehensive historical picture of the development of the subject property, though they reach differing conclusions. RBA's history of the place however was more detailed than that provided previously, including by Lovell Chen.

[118] Lovell Chen's report did not reference the Thematic History but accepted that "13-15 Avalon Road evidences the interwar subdivision and development of a mansion estate" (Lovell Chen 2023, p.41 para 65).

[119] I found the historical assessment done by RBA to be more consistent and persuasive in that it analysed the history of the property in reference to the historical themes laid out in the Thematic Environmental History. The full history of the ownership of the property was clearly connected to a class of people and historical themes significant to the history of the municipality.

[120] While Lovell suggested that the house provided "no insight into the individuals who lived there, nor is it demonstrative of any particular association" (Lovell Chen 2023, p.38), RBA's assessment recognised the way in which the house demonstrated the "preferences of a moneyed clientele" that was "highly indicative of interwar Stonnington" (RBA 2023, p.15). Again, this suggested to me that Lovell's historical assessment was more relevant to the consideration of prominent *individuals* as would normally be assessed under Criterion H (associative significance).

[121] Lovell conceded that:

a) *13-15 Avalon Road stands as a representative example of an interwar residence designed in the Old English style and located in a large garden setting. It is a property which, as related to design, is similar to many others located in Stonnington and directly related to other houses designed by the same architect. (p.42)*

[122] He went on to reason that:

a) *Many of the stylistically comparable buildings are either graded significant or contributory, if within a precinct. My view is that 13-15 Avalon Road is a place which, if located within a precinct in which interwar development was core to its significance, would be graded contributory to that precinct. (p.42)*

[123] However, it is the generally accepted practice that Significant graded buildings are so graded because they would be significant in their own right whether in or out of a Precinct. A significant building may *also* contribute to a Precinct, but its significance is such that it is not reliant on that contribution for protection. Again, its similarity to other Significant graded houses of the class would tend to reinforce its representative value.

11 Appendix C Response to Submissions Table

The following table provides the consultant responses to the phase of community submissions following their public exhibition.

Submission	Summary	Consultant Response
1	Supporting. • Appreciates the design, particularly the chimneys; • similar to other Wright homes such as 21 Power Ave and across area; • merit as the most grand residence on Avalon Road; • superior to those in Hampden Rd.	• Supports proposed historical and representative significance in the current citation. • It is distinguished among Arnaud Wright's Old English designs by its large scale and spacious garden setting with curved driveway, tall chimneys and terracotta shingle roofs with finely detailed eaves. • The house is representatively significant as a representative example of the Old English revival style of house and particularly of the architect Wright's interpretation of the style, as we believe that is where it is outstanding in its class, besides its historical importance. • The consultants view is that the aesthetic qualities of the house can be understood as part of its representative as well as historical significance as an interwar house by architect Arnaud Wright. • Comparative analysis currently includes 21 Power Avenue and it is acknowledged that the subject house compares well. • The 'landmark' quality of the house in Avalon Road locality could be noted in the citation description for its local interest. The consultant's view is that its local prominence in the streetscape is similar to that of other significant houses in their localities rather than being a municipal-wide landmark such as is the case with some town halls or churches.
2	Supporting. • Offers a glimpse into the past; • Excellent example of Georgian Old English architecture; • Local landmark; • Arnaud Wright legacy	• Supports proposed historical and representative significance in the current citation. • The 'landmark' quality of the house in Avalon Road locality could be noted in the citation description for its local interest.
3	Supporting • Old English style;	• Supports proposed historical and representative significance in the current citation.

	• Important piece of history reflecting mansion estate subdivision; • Contribution to character of nearby streets and prominent position; • Arnaud Wright's legacy is also seen at 21 Power Ave which is similar but smaller; • Aesthetic qualities include generous garden, curved driveway and metal gates that enhance streetscape.	• The consultants view is that the aesthetic qualities of the house can be understood as part of its representative as well as historical significance as an interwar house by architect Arnaud Wright. • Citation acknowledges that the expansive garden setting with curving driveway following original pathway contributes to the significance of the place as an appropriate garden and landscaped setting, but the garden plantings and landscape fabric itself is not original.
4	Supporting. • Grand and attractive property gives sense of grandeur to streetscape; • Historic and aesthetic significance and increasingly rare example of its type.	• Supports historic significance • The 'landmark' quality of the house in Avalon Road locality could be noted in the citation description for its local interest. • The house has not been assessed as rare or endangered (Criterion B) as a type given there are a number of comparable exemplars, against which the house compares well.
5	Supporting. • Warrants same or higher grading as Thurla 1 Avalon Rd; • Represents history of the Hampden, Redcourt and Avalon Roads area as it once was; • Scale and prominence warrants protection; • Without heritage protection, property risks redevelopment that could degrade character of the area; • Avalon Rd is a unique residential boulevard warranting higher protection.	• Supports historic significance • The 'landmark' quality of the house in Avalon Road area could be noted in the citation • The assessment of the streetscape as a whole was not in the scope of this analysis as only individual significance has been assessed. It is noted that previous attempt to extend precinct into Avalon Rd was not recommended at Panel.
6	Out of scope. • Refers to 34 Armadale Street.	
7	Supportive. • House has historical and representative significance	• Supports historical and representative significance.

	associated with mansion subdivision of old Avalon mansion; • Excellent version of Old English Revival Interwar house; • High position overlooking landscaped garden is also significant with large grounds, curved driveway, metal front gates; • Arnaud Wright contributed to development of Stonnington, many houses including 21 Power Ave which is similar but smaller; • Heritage streetscapes are enjoyed by residents.	• 21 Power Avenue is included in the comparative analysis, and confirms the subject properly compares favourably. • The 'landmark' quality of the house in Avalon Road locality could be noted in the citation description for its local interest.
8	Objecting. • Panel recommended the property not be included in the heritage precinct in 2023; • Panel found insufficient justification for the application of an individual HO during C320; • Raworth concluded that the property is not as sophisticated or skillfully designed as English Domestic style residences individually protected in the HO; • Extent did not recommend individual protection; • Bashta did not believe the house reached a threshold of significance as the local threshold for Old English Revival was high; • Lovell similarly did not believe it was of individual significance compared to other exemplars of the style; • Patrick did not believe the garden was significant; • Landmark Heritage evidence said the property	• Panel in 2023 only determined the proposed Precinct extension to lack merit on the basis that the precinct should not be extended around the corner. • Panel's recommendations were in relation to the proposed precinct extension with the house as a contributory property. Panel only commented in the context of that discussion that "[t]here is insufficient justification for the application of an individual Heritage Overlay to 13-15 Avalon Road" on p.45 C320 of the panel report. While there may have been insufficient justification provided to Panel at the time, the latest report has addressed this by providing a comprehensive comparative analysis of the property against others of its class, particularly other significant houses by the architect. This is not something that Panel had the opportunity to assess as part of C320. • Raworth and Lovell's exemplars generally draw from aesthetically significant exemplars of the Old English style that are among the most outstanding in Stonnington, incorporating elements that are not exhibited by the subject property such as half timbering and more ornate levels of detail. To warrant heritage protection however, a place need not be better than, but only as good as other comparable places on the HO. The most recent comparative analysis has been more thorough and rigorous in comparing

	is probably not for individual significance through its association with Arnaud Wright. • Only one heritage expert considered there should be a site specific control; • Therefore there is no basis for the control.	the house to comparable places that are graded Significant on the HO, with attention to representative and historical significance as Old English Revival houses, particularly those designed by Arnaud Wright. It is acknowledged that the house may not be aesthetically significant when compared to a small number of the most outstanding exemplars of the style, but rather that it meets a threshold of significance as it is as good as comparable places of its class, that is interwar Old English houses that are historically and representatively significant. The new comparative analysis also establishes that the house is outstanding as a representative of Wright's work, a historically significant influence in the development of the municipality in the interwar period. It therefore meets a threshold of significance under Criteria A and D. • While it is acknowledged that a small number of places surpass the subject property in exhibiting the Old English Revival style, a place does not have to be better than all other places on the HO to meet a threshold of significance. To meet Criterion D at the local level, a place needs to be better than typical of its class (C320ston Panel Report, p.193). Several features mark the property as better than typical – its scale; detailing, particularly of the eaves and chimneys; its landscape setting and its particularly fine representation of the notable local architect's oeuvre compared to his other designs. Those buildings that surpass the subject property such as Mindai and 2 Ledbury Court, tend to have additional significance beyond representative or historical significance, such being significant according to Criterion E (aesthetic significance). The subject property is as good as or better than many places that meet the threshold for Criterion D (representative significance) and Criterion A (historical significance). • The garden has not been assessed as having individual significance in this instance, but only as contributing to the overall setting of the place. Under the proposed citation, the garden's individual elements may be changed providing that an appropriate setting is maintained that overall preserves or enhances the place.

		• Extent considered the house as a contributory part of a precinct extension, while the most recent citation assesses the place in relation to other individually significant places of its class. • Landmark Heritage supported the significance of the property overall, only not for Associative Significance (Criterion H) as the threshold for associative significance is higher, not only that the place was designed by the architect but that the association is a special one. In this instance, Trethowan agrees that Criterion H is unlikely to be met. • The latest heritage assessment and citation addresses gaps in previous assessments by applying a more thorough and rigorous comparative analysis with comparable properties graded Significant on the HO and as such provides a basis for the proposed protection of the property under the HERCON criteria A and D. • Trethowan reviewed and considered previous assessments and reached its own conclusion regarding the significance of the place based on the comparative analysis and HERCON criteria. Trethowan's opinion is that some previous assessments have not compared the place to enough comparable places of its class, that is interwar houses by the architect currently protected on the HO and interwar Old English style houses significant for criteria A and D. The house compares favourably to these.
9	Supportive • House is an important element of the area's heritage though outside heritage precincts; • Landscape garden setting • Wright was an important contributor to interwar development.	• Support is noted • Citation acknowledges that the expansive garden setting with curving driveway following original pathway contributes to the significance of the place as an appropriate garden and landscaped setting, but the garden plantings and landscape fabric itself is not original.
10	Supportive. • Old English style of house has historical and architectural significance as well as the architect;	• Reasons for support are noted and the current citation acknowledges both the historical and architectural significance in terms of the interwar development and the architect Wright's contribution to the municipality.

	• The [redacted] family has a pool out back that was rare in the 1960s.	• The pool has not been assessed against the rarity of pools for the period however it is considered that as a post-war accretion to the house, the pool is outside the period of historical and representative significance for the property (interwar) and so has not been included as a contributory element in the citation.
11	Supportive. • White roof area and pool may not warrant heritage protection; • Unsure about the gardens.	• Citation acknowledges that the expansive garden setting with curving driveway following original pathway contributes to the significance of the place as an appropriate garden and landscaped setting, but the garden plantings and landscape fabric itself is not original. • Post-war additions/alterations such as the bar extension, games building, swimming pool and shed are not significant.
12	Supportive • Place has aesthetic, architectural and historic value; • House is in Garden Subdivision neighbourhood character area.	• Support for historic and architectural significance noted. • The broader street context has not been included in this assessment.
13	Supportive • Place has historical, aesthetic and representative significance; • Landscaped garden is significant; • Ken Alisa islands out in the skyline.	• Support for historic and architectural significance noted. • Historical and representative significance is in the current citation; • The 'landmark' quality of the house in Avalon Road area could be noted in the citation