

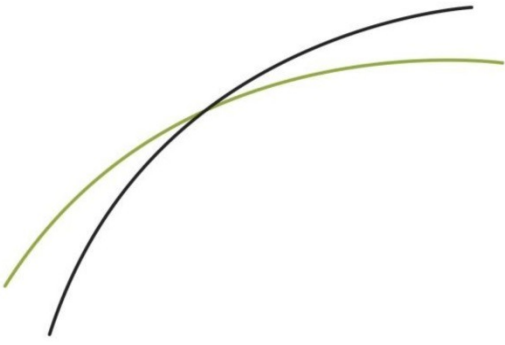
Amendment C205 to the Hume Planning Scheme – Lindum Vale PSP

Statement of Evidence

Final

Satterley Property Group Pty Ltd

12 February 2018



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1 EXPERT DETAILS

This report has been prepared by heritage consultant Ian Travers, Senior Associate at Extent Heritage, based in Coburg, Victoria.

1.1 Name and address

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1.2 Qualifications and experience

1.2.1 Qualifications

- Master of Arts in Archaeological Heritage Management (University of York, 2001)
- Bachelor of Science in Archaeology (University of Liverpool, 1999).

1.2.2 Professional Affiliations and Memberships

- Australia ICOMOS (the Australian national committee of the International Council on Monuments and Sites) - President and Executive Committee member
- Chartered Institute for Archaeologists, UK - Full member (MCIfA).

1.2.3 Statement of expertise to make this report

I have worked as a professional archaeologist for over 15 years, the last 8 years of which have been as a heritage consultant in Victoria.

In this time I have undertaken numerous heritage studies and assessments of historic heritage in peri-urban municipalities. These have included municipal heritage studies and thematic studies on behalf of local councils and government agencies in each of the municipalities around the west and north of Melbourne that are most characterised by the presence of dry stone walls. They have also included post-contact heritage assessments for growth area Precinct Structure Plans (PSPs) in Whittlesea, Hume and Wyndham on behalf of the Growth Areas Authority (GAA), Metropolitan Planning Authority (MPA) and then Victorian Planning Authority (VPA), each of which recorded the presence of dry stone walls, assessed their significance and made management recommendations.

I am very familiar with the application of the HERCON assessment criteria and the Australia ICOMOS Burra Charter for Places of Cultural Significance. I am the current President of Australia ICOMOS.

My direct experience in the management of dry stone walls includes the management of restoration works to the State-listed dry stone sheepwashes at Bessiebelle, in the Shire of Moyne, on behalf of Heritage Victoria. I have also had oversight of reconstruction works for several walls in the Melbourne metro area, including that at the corner of Plenty Road and McArthurs Road, South Morang (listed as a 'good example' of a reconstructed stone wall in the *Wyndham Dry Stone Walls Study*, Biosis 2015) on behalf of VicRoads. I have provided advice on the management of dry stone walls throughout Whittlesea, Hume and Wyndham. At a hands-on level, I have completed a workshop on the construction of dry stone walls run by recognised expert Alistair Tune for the International Specialised Skills Institute.

2 THE SCOPE OF THE REPORT

2.1 Basis for this report

The following sets out the facts, matters and all assumptions upon which this report proceeds.

I have been engaged by Norton Rose Fulbright Australia on behalf of Satterley Property Group Pty Ltd ('Satterley') in relation to Amendment C205 to the Hume Planning Scheme. This Amendment seeks to include the PSP and the Lindum Vale Native Vegetation Precinct Plan into the Planning Scheme and introduce or update relevant planning provisions.

A panel has been convened to consider the Amendment and the submissions made in response to the Amendment. I have been engaged to prepare an expert report to provide to the Panel, and, if necessary, to appear at the hearing to provide evidence.

2.2 Background to the report

Satterley is proposing to subdivide land in the Lindum Vale Precinct Structure Plan (PSP) (VPA 2017) area, at 1960 and 2040 Mickleham Road Mickleham, for residential development.

The area contains a number of dry stone walls, in various states of preservation. The PSP 'Vision' anticipates that 'the heritage value of...the existing dry stone walls will also contribute to the creation of a strong neighbourhood character' in the new residential development (PSP 2017, p11), and one of the key objectives of the PSP is to 'Create a strong 'sense of place' through the design of subdivision, development, streets and open spaces that celebrates, conserves and integrates key natural and cultural heritage elements. These elements include:... dry stone walls' (PSP 2017, O2 p11).

On the subject of dry stone walls the Lindum Vale PSP has largely drawn on a report 'Lindum Vale Dry Stone Wall Historic Heritage Assessment' (Cultural Heritage Management Group 2015). This assessment identified a total of 12 dry stone walls in the PSP, and applied a rating to each. The rating scale applied is set out in Table 1 below.

Table 1 – Ratings of dry stone walls in the Lindum Vale PSP according to Stevens 2015.

Condition Rating	Condition Description	Length (m) in PSP
Rating 1	Wall remnants and single course walls. These were either never intended as dry stone walls in the first place, but were merely where farmers had piled gleaned stone from the paddocks, or where a wall once existed but had been removed apart from foundation stones.	3,804
Rating 2	Half-height composite e [sic.] walls, less than 40%, but more the 20% intact. These walls still have some small sections which demonstrate their original form, but more than half their structure is either fallen or inexpertly replaced, and in many cases substantial amounts of stone have been removed, for example walls along well used local roads have had much of the coping stone stolen.	281

Condition Rating	Condition Description	Length (m) in PSP
Rating 3	Full height walls or less than 80% but more than 60% intact. These are the more intact 'typical' walls of the area. Some full-height walls, less than 40% intact, have been altered with the introduction of post and wire, possibly because the skill to rebuild them to full height was no longer available. Half-height walls, more than 40% intact, still have some small sections that are intact to their original height and construction, but in most cases have up to half their structure either fallen or inexpertly replaced.	215

As can be seen from Table 1, the great majority of the dry stone walls in the PSP were categorised as being of Rating 1, i.e. of poorer condition. Figure 2 shows the location of all of the walls in the PSP which have been assigned a higher rating (Rating 2 or 3), and their assigned ratings are shown in Figure 2.

These dry stone walls are recorded as follows in the Stevens 2015 report:

- DSW1 (recorded as including components DSW1-1 & DSW 1-2) – running east from the southeast corner of the adjacent Parnell's Inn property. This was categorised as Rating 2 by Stevens (2015);
- DSW2 (recorded as including components DSW2-1 & DSW2-2) – continuing eastwards from the east end of DSW1, but separated from it by a gate. This was categorised as Rating 3 by Stevens (2015); and
- DSW3 – running south, along Mickleham Road from the Parnell's Inn property. This was categorised as Rating 3 by Stevens (2015).



Figure 1 – Showing locations of the subject dry stone walls (the location of gates is indicated by purple triangles). (Source: After EHP 2017)

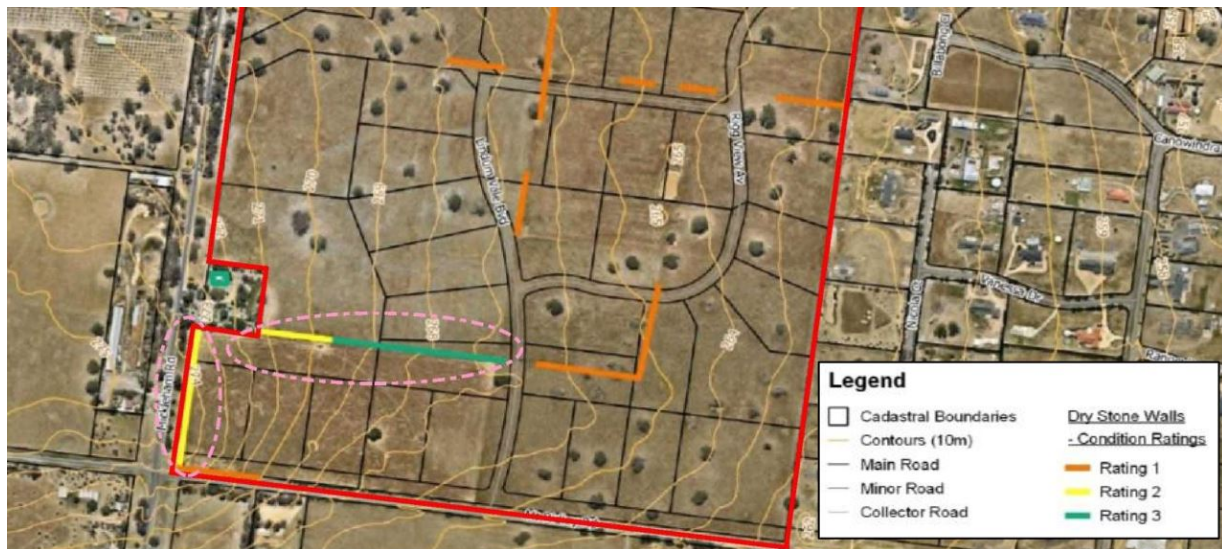


Figure 2 – Plan of the southern part of the PSP, showing the ratings of the subject dry stone walls (circled in pink). Note – the PSP layout shown in this plan is out of date. (Source: After Stevens 2015 & EHP 2017)

The Amendment proposes to implement the Lindum Vale Precinct Structure Plan (PSP) by introducing a new Schedule 9 to the Urban Growth Zone to the Hume Planning Scheme and applying it to the precinct. This will effect changes to the Hume Planning Scheme that include amendment of the Schedule to Clause 52.37, which relates to the conservation of dry stone walls in the municipality, to exempt the removal of Rating 1 dry stone walls (as identified by the Stevens 2015 report) from requiring a planning permit. This requirement still applies to all of the other dry stone walls in the PSP.

The PSP requires that dry stone walls identified as Rating 2 and 3 (moderate-high value), and shown as such in its Plan 5 'Image, Character and Housing', be retained. It is these walls (hereafter the 'subject walls') to which this report relates. Since preparation of the Stevens report, the subject walls have been re-assessed by EHP (2017) and the results of this work are discussed below.

A number of Guidelines and Requirements relating to dry stone walls are included in the PSP. Most pertinent to this report are Guidelines G11 and G12. The remaining relevant Guidelines and Requirements (G13 & R12-R14) relate to the reinstatement or reconstruction (at another location) of dry stone walls, and the installation of services across their alignment. These requirements are not directly relevant to this report and are therefore not discussed further.

Guideline G11, which has been reworded and made a Requirement of the PSP at the request of Hume City Council, now states that:

Dry stone walls identified on Plan 5 Image, Character and Housing as 'Dry Stone walls to be retained and repaired - rating 2-3 (moderate to high value)' must be retained unless otherwise agreed by the responsible authority. Dry stone walls to be retained must:

- *Be situated within public open space or road reserve to the satisfaction of the responsible authority;*
- *Have a suitable landscape interface;*
- *Be checked by a suitably qualified dry stone waller for any loose stones and risk to public safety. Any loose stones are to be reinstated in the wall in secure positions;*

- *Retain post and wire or post and rail fences situated within the walls, with any wire protruding beyond the vertical face of the wall reinstated to its original position or removed; and*
- *Be incorporated into subdivision design to minimise disturbance to the walls (e.g. utilisation of existing openings for vehicle and pedestrian access).*

Congruent with the above, Guideline G12 advises that 'Land uses abutting retained dry stone walls should enhance public visibility of the walls', and that 'Relevant uses include open space, conservation reserve and road verge.' Satterley has requested that this Guideline be deleted in the Amendment as it is not compatible with the envisaged development. However, the Victorian Planning Authority (VPA) does not support the deletion of G12 and have asserted that the incorporation of dry stone walls of moderate-high heritage value into open space, conservation reserves or road verges will improve the amenity of the PSP.

Satterley is keen to ensure that any retained dry stone walls don't inhibit access to parts of the PSP, and this has been expressed as a concern in relation to the Amendment. This is a particular issue in relation to the directed retention of DSW2 that coincides with the proposed spinal thoroughfare through the PSP (see Figure 3). The retention of the east west aligned wall will present difficulties around connectivity in this part of the PSP, especially as the VPA has asserted that the creation of breaks in the wall for pedestrian and vehicle access should be kept to a minimum (Part A 2018).



Figure 3 – Plan of the southern part of the PSP showing the subject dry stone walls (circled) in relation to the main spinal access road. Note – the detail of the PSP layout remains subject to revision. (Source: After EHP 2017)

Taking the above into account, the issues to be addressed are therefore as follows:

- Whether the ratings assigned to the dry stone walls in the PSP by the Stevens 2015 report are correct, such that they should direct which walls are to be retained in the PSP;
- Whether walls being assigned higher ratings, where correct, should preclude their removal, in whole or part; and
- What alternatives may be appropriate, particularly with regard to the issue of access and permeability within the PSP.

2.3 Literature or other material used in making the report

This report has been informed by a review of the following documents:

- Part A Submission – Amendment C205 to the Hume Planning Scheme (Part A 2018), including summaries of submissions by Satterley, Hume City Council and others
- Dry Stone Wall Assessment at 1960 Mickleham Road, Mickleham, Victoria by EHP 2 October 2017 (which accompanied Satterley's submission to the exhibited amendment)
- Hume Planning Scheme Amendment C205 Explanatory Report (VPA 2017)
- Lindum Vale PSP (PSP 2017)
- Lindum Vale Dry Stone Wall Historic Heritage Assessment (John Stevens, Cultural Heritage Management Group August 2015).

In addition, the following tasks have been undertaken:

- A site visit to inspect the subject dry stone walls at the site
- Examination of relevant heritage management policy and guidance; the Australia ICOMOS Burra Charter (2013) and the HERCON (Heritage Convention) criteria (agreed to by all jurisdictions in 2008 by the then Environment Protection and Heritage Council)
- Examination of other approaches employed to assess the significance of dry stone walls in the region and a review of the grading followed by the PSP, with particular reference to the *Melton Dry Stone Wall Study* (Planning Collaborative (Vic) Pty Ltd 2011) and the *Wyndham Dry Stone Walls Study* Biosis 2015 (see p7 below)
- Discussion with Satterley's representatives and advisors.

2.4 Limitations

This statement relates only to the walls identified in the Lindum Vale PSP as walls 'to be retained and repaired rating 2-3' – those identified as walls DSW1, DSW2 and DSW3 in the Stevens 2015 report. Other walls in the PSP were not examined in the preparation of this statement.

3 SUMMARY OF EXPERT OPINION

It is my professional opinion that:

- I am broadly in agreement with the ratings assigned by the Stevens 2015 report, on which the PSP is based. However, that assigned to DSW1 overstates its level of survival. Moreover, the ratings assigned relate solely to condition and are therefore not necessarily wholly representative of the heritage value of the features; and
- Notwithstanding agreement on the assessment of the walls (using Stevens' ratings), the heritage significance of wall DSW2 (Stevens' DSW2-1 & DSW2-2) does not necessarily warrant retention of the entire structure in situ.

In addition, it is my informed opinion that:

- The retention of dry stone wall DSW2 in the site is not practical, especially if such a long, continuous section of wall is required to remain bisecting the PSP.¹

These points are expanded upon below.

This section concludes with recommendations around amendments to the relevant guidelines/requirements of the PSP.

3.1 Rating of the walls in the PSP

On the subject of dry stone walls, the PSP has been directly informed by the Stevens' 2015 report 'Lindum Vale Dry Stone Wall Historic Heritage Assessment'. This report employed a system of 'condition ratings' which was used to assess the dry stone walls in the PSP, and the PSP currently requires that walls assigned a rating of 2 or 3 (described in the PSP as correlating with moderate to high value) should be retained within the PSP.

3.1.1 Basis of ratings

The Stevens report essentially employs its condition ratings to determine levels of heritage significance. The ratings employed are loosely in alignment with those established by recent best-practice standard documents – the municipality-wide studies produced for the City of Melton and the City of Wyndham (Planning Collaborative (Vic) Pty Ltd 2011 & Biosis 2015). However, apparently in an attempt to make the ratings specific to the site, the system employed rather awkwardly establishes more discrete thresholds and lacks the continuity of the systems employed in these other studies. For example, walls supplemented by post and wire are deemed to be full height walls which have been altered through repair, which may be the case at this site, but this ignores that post and wire fences exist elsewhere as a composite type in their own right – so the system employed identifies these walls as a lower significance example of one type of wall rather than a higher significant example of another. Furthermore, the system employed focusses almost entirely on the condition of the walls relative to others in the site, whereas the Melton study, for example, also takes into account the rarity and representativeness of the walls on a municipal level when drawing conclusions around heritage value.²

Condition rating alone does not represent a holistic assessment of heritage value, and best practice would dictate that it should therefore not be the sole basis for heritage management decisions. In addition to the integrity/condition/authenticity of walls, and their rarity and representativeness, the

¹ I should note however that I am not a professional dry stone waller or an OH&S specialist.

² A municipality-wide comparison of the walls in the PSP is also beyond the scope of this report.

Wyndham study also undertook significance assessments on the basis of criteria and thresholds defined by the Australia ICOMOS Charter for Places of Cultural Significance ('the Burra Charter', 2013) – these criteria being aesthetic (including landscape quality), historical, technical/scientific and social significance. This approach is enshrined in the 'HERCON criteria' that have been adopted by all Australian governments for the purposes of heritage assessment. This is also the approach employed by the EHP 2017 report on the subject walls which, in conclusion to a somewhat more expansive assessment against each criteria, provided the following summary of significance for the dry stone walls in the PSP:

'The walls in the study area have only limited historical significance at the local level, but mainly as a contributor to the history of pastoralism and farming across the broader landscape, rather than for their individual characteristics. Likewise, although the walls have aesthetic qualities, this is contributory to the broader rural landscape, which is currently undergoing massive change from urban development. The walls themselves are not considered to have archaeological value. The construction style is typical of walls in the basaltic areas of northern Melbourne area [sic.] and their broader scientific value is also limited and offers no substantial opportunities for further scientific research except for their potential for wildlife habitat values.'

I agree with the EHP assessment, and this summary.

Although it is not considered that the adoption of the Burra Charter approach results in any variation in the relative importance assigned to each of the dry stone walls in the PSP, a holistic appreciation of their heritage value would better inform management decisions – see below.

3.1.2 Accuracy of ratings

Historical background and detailed descriptions of the subject walls are included in Stevens 2015 and, to a greater extent, the EHP 2017 report. The following builds on the findings of these reports, but does not repeat detail except where pertinent to the purpose of this report.

Notwithstanding the above discussion around the appropriateness of the rating system employed, I disagree with some of the conclusions of the Stevens 2015 report, on which the PSP is based, specifically that:

- DSW1 is characterised as being Rating 2 by Stevens. Instead, given its very poor condition, it is my opinion that this section of wall should not be considered as being of higher than Rating 1 (and therefore not marked for retention in the PSP) – this conclusion is also drawn by EHP (2017); and
- DSW3 was characterised as Rating 2 by Stevens, whilst wall DSW2 was assigned Rating 3. Instead, it is my opinion that the former (DSW3) should be considered of equal if not higher significance. In other words, DSW3 should be considered one of the best preserved walls in the PSP, if not the best.



Figure 4 – Looking northwest across Stevens’ wall DSW1. (Source: Extent Heritage)

As shown in Figure 4, DSW1, which I agree with EHP (2017) clearly represents a continuation to the west of DSW2, is in extremely poor condition and no longer comprises a continuous line of stones, much less a structure. On the basis of its possible original form, EHP determine that the remnants fall somewhere between Rating 1 and 2, but more closely Rating 1 given its condition. I agree with the EHP conclusion in this respect.

It is therefore considered that it should not be required that wall DSW1 be retained in the PSP.

Wall DSW2 (Figure 5) comprises two ‘skins’ with hearting stone between and it retains a consistent A-shape profile. There is relatively little coursing of stones in the skins, although this is possibly symptomatic of the irregular shape of the stones at the site. The stones do however appear to be roughly graded, with larger stones toward the bottom of the wall, and plugging stones are present. Aside from some sections which appear to be more eroded than others, this structural form is fairly consistent throughout the wall, and although EHP (2017) separate the wall into two sections (DSW2-1 & DSW2-2), I would be inclined to attribute this whole section with the same relatively high rating (Rating 3).



Figure 5 - Looking north east along wall DSW2, February 2018. (Source: Extent Heritage)

As with wall DSW2, wall DSW3 (Figure 6) comprises two 'skins' with hearting stone between and retains a consistent A-shape profile. There is again relatively little coursing of stones in the skins, symptomatic of the irregular shape of the stones at the site, but there appears to be generally more consistent grading of stone size through the wall, and plugging stones are present. The northern section of the wall is more eroded and has been supplemented by inserted post and wire fencing and a dense hedgerow. Further to the south the structure retains greater integrity, and some sections retain coping stones. Although not as consistent in structure and condition as wall DSW2, it is my conclusion that the whole of this wall is relatively superior to the other walls in the PSP.

With regards to the heritage significance of walls DSW2 and DSW3, although DSW2 is considered to be of some technical value and historical value in that it delineates a historic field boundary, it does not play as important a role in the landscape as DSW3. The latter is of at least the same technical value as DSW2 and perhaps greater historic value in that it delineates a historic property boundary and better represents the history of dry stone walling in the area. Its position at the edge of the property, along a road reserve, means that it plays a role in the landscape and its aesthetic significance is higher, especially for the sections which retain copestones and are largely intact.

The above conclusions are in line with those of EHP (2017), as shown in Figure 7 below.

Progressing from simple condition rating to a more holistic assessment, the aesthetic significance of the dry stone walls in the PSP should be considered in relation to the proposed residential development. As EHP state (quoted above), 'although the walls have aesthetic qualities, this is contributory to the broader rural landscape, which is currently undergoing massive change for urban development'. The role of the walls in the landscape will be much altered within a residential development – even if they are to be retained in open space, the spatial context for these features (and their audience) will become much more localised.



Figure 6 - Section of wall DSW3, looking southwest towards the junction of Mickleham Road and Mt Ridley Road. (Source: Extent Heritage)

Wall/Segment	Intactness	Condition	Condition Rating (Stevens 2016)	Revised Condition Rating (using Stevens' -2015] criteria)
DSW1	Poor	Mostly Collapsed – Highly Impacted	Rating 2	Rating 1
DSW2-1	Partially intact	Poor to good	Part rating 2 Part rating 3	Rating 3
DSW2-2	Largely intact	Good to excellent	Rating 3	Rating 3
DSW3	Largely intact	Fair to good	Rating 2	Rating 3

Figure 7 – Intactness and condition assessment presented in EHP 2017. (Source: EHP 2017)

3.2 Justification for partial removal of DSW2

As stated above, DSW1 is not considered to be of sufficient significance to warrant retention in the PSP under the rating system employed. From site inspection, it is evident that this wall was a western continuation of DSW2 (EHP 2017 is also of this view).

At both the western and eastern ends of DSW2 there are timber posts marking gateways (Figure 8 and Figure 9). The walls at these interstices are not structured stone wall ends but instead taper off, in the case of the western end, and abut the wooden post at the eastern end. The impression is that the wall is either in poorer condition at the west end and has been repaired against the post at the eastern, or that the gateways are relatively recent openings created since the wall was constructed.



Figure 8 – Western end of wall DSW2, showing the tapering wall and wooden post. (Source: Extent Heritage)



Figure 9 – Eastern end of wall DSW2, showing wall abutting wooden post. (Source: Extent Heritage)

Both the relative deterioration of section DSW1 and the apparent creation of new apertures, and so wall DSW2 in its current state should not be considered to represent a complete historical entity. This being the case, its retention should be seen as simply retaining the presence of dry stone wall in the PSP, rather than preserving a single historical entity of high integrity. It is therefore my professional opinion that neither the introduction of additional apertures nor the removal of sections of the wall if absolutely required should be considered to represent too adverse an impact, especially considering the diminished landscape role of the walls within new residential development.

3.3 Practicality of retention of dry stone walls

Dry stone walls were designed to meet the dual function of defining land (and restraining livestock) and land clearance in a rural pastoral context, and their retention within residential areas is problematic given their construction and nature. One of the earliest dedicated studies of dry stone walls in the area *Built to Last: An historical and archaeological survey of Dry Stone Walls in Melbourne's Western Region* (Vines 1990), concludes that 'The best walls... have survived because of their lack of accessibility to an unsupervised general public'.

Without ongoing maintenance dry stone walls in this context are likely to entail an OH&S risk, and it should be recognised that the addition of mortar negates the dry stone nature of the walls and thus much of their aesthetic and historic heritage significance. If retention in their dry stone state were to be achieved, the provisions required are such that this should be recognised from the beginning of the PSP planning process.

In requiring the retention of DSW2 the PSP seeks to preserve a long, continuous length of wall that bisects the PSP area. The likelihood is that, by separating residential areas – even if this were within an area of open space, this would significantly increase damage to the wall through uncontrolled scaling, which would magnify the OH&S issues. I would contend that the heritage values of wall DSW2 could be better retained through other means, for example through site interpretation and/or the proposal outlined below as mitigation for the removal of all or parts of the wall

It is not considered that DSW3 would be subject to the same pressures as the other walls internal to the PSP and there are many precedents for the post-development retention of dry stone walls in road reserves in the region.

3.3.1 Suggested alternatives to retention of DSW2 in situ

In the event that the removal of all or part of wall DSW2 is agreed, it is suggested that the loss of this wall could be effectively mitigated through employment of one, or a combination of, the measures listed below (to be agreed with the responsible authority).

This process, and any other management works to be undertaken in relation to dry stone walls in the PSP, should be directed by preparation of a dry stone wall management plan.

Reconstruction – e.g. along Mt Ridley Road

In line with Requirements 12 and 13 of the PSP, a representative section (to be agreed with the responsible authority) of wall DSW2 could be reconstructed elsewhere in the PSP.

Some wall survives along Mt Ridley Road, running east from its junction with Mickleham Road and also marking a historic property boundary, but this is in a very fragmented state (Rating 1 under Stevens' assessment) (see Figure 10). Although essentially an interpretive act, given the greater prominence of the location and a greater audience along the road corridor, it is considered that restoring wall along this boundary would represent a much more effective approach to communicating the historic character of the area.



Figure 10 – Fragmentary wall remnants along Mt Ridley Road. (Source: Extent Heritage)

Interpretation of heritage values

The heritage values of wall DSW2 should be retained at the site in some form. If this is not to be through retention of the wall in situ, a program of heritage interpretation at the site could be employed to convey these values to the new residents and wider community.

Methods could include:

- On-site materials – in the form of landscape design inspired by the historic structures or interpretive panels describing the history of the area and its historic fabric, and referencing remaining elements such as other retained walls and Parnell's Inn; and/or
- 'Off-site' materials – employing media such as a website or information booklets distributed to new residents to communicate the same message, perhaps with reference to the broader historic landscape.

3.4 Recommendations

The following recommendations are prompted by the above conclusions:

3.4.1 Recommendation 1 – reduce rating of wall DSW1

The PSP's Plan 5 Image, Character and Housing, should be amended to remove Stevens' wall DSW1 from the category 'Dry stone walls to be retained and repaired – rating 2-3 (moderate-high value)'.

This would be to reflect that it should actually be considered a Rating 1 wall under the system employed, and therefore it should not be earmarked for retention under Guideline G11.

3.4.2 Recommendation 2 – allow for the removal of all or part of wall DSW2

It is not considered that the holistically considered heritage significance of wall DSW2 demands its retention in situ. It is also considered that retention of the whole wall would be impractical.

It is therefore recommended that, notwithstanding the blanket retention of Rating 2 and Rating 3 walls envisaged under Guideline G11 (reworded and made a Requirement of the PSP at the request of Hume City Council), allowance be made for all or part of wall DSW2 to be removed. The heritage value of the feature should be mitigated through one of the approaches described under 3.3.1 above, through discussion with the responsible authority.

4 STATEMENTS & DECLARATION

All of the opinions expressed above are the result of research and investigation undertaken by the author, and the above does not raise any questions which fall outside the expert's expertise.

To my knowledge this report is complete and accurate for its intended purpose.

'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.'