

Mr Steven Avery
Executive Director
Heritage Victoria
1 Spring Street,
Melbourne, Victoria 3000

21 December 2025

Dear Mr Avery

Re: P39339 Exford Homestead (H0316)

I refer to a request for further information (RFI) received from Heritage Victoria, dated 24 October 2025, in relation to permit application P39339 for the residential subdivision of part of Exford Homestead, associated services and landscaping, and a suite of conservation works to the registered buildings. This correspondence has been prepared on behalf of the property owner to provide the additional information requested in the RFI.

The following information was requested in the RFI (*italicised*), with a response provided below each item.

Subdivision

There is a general level of comfort for the subdivision layout as it relates to the northern section of the site, noting that earlier officer concerns raised through the Exford Road Conservation Area Urban Design Framework and pre-application discussions have largely been addressed. However, clarification and further consideration are sought on the following points:

- *Consider reversing the densities of proposed lots 66 and 67 with Lot 60, to place lower-density development closer to the heritage features, thereby reducing visual impacts on the setting of the place. The proximity to the B10 Barn/Coach House increases the sensitivity of this interface.*

Stages 66 and 67 are nominated as multi dwelling sites and are strategically located within this area of the proposed subdivision to satisfy a number of planning stipulations and amenity requirements. General planning principles state that higher density housing is best situated adjacent to open space areas (in this instance Lavery Park) to afford residents of higher density dwellings easily accessible areas for outdoor recreation as well as borrowed amenity. In addition, these stages have direct frontage to a connector road (as identified in the Toolern Precinct Structure Plan) which is preferable from a traffic management perspective as well as an interface response.

At this stage, a design response for Stages 66 and 67 has not yet been developed, however it is noted that all three identified stages (60, 66 and 67) are included in the same 'Residential Use' area 2A in the endorsed *Exford Road Conservation Area: Urban Design Framework* (UDF). The UDF includes built form requirements and guidelines to guide new development in this area. These guidelines identify all of area 2A for conventional density residential development, and a maximum height of two storeys for area 2A so no difference in height is anticipated for future development between lots 60 and 66/67 as currently identified.

It is accepted that there would be a greater density of development in Stages 66 and 67 as proposed (i.e. townhouse development or the like). However, in most instances, multi dwelling sites would have landscaping to their frontages to soften any built form and form an interface with the public realm. In addition, the northern boundary of lot 71 (the farm buildings precinct/ commercial heritage site) is set back from B10 in the order of 10 metres, and the farm buildings precinct is further separated from Stages 66 and 67 by a new roadway in the order of 25 metres. On this basis, it is not considered there would be any heritage benefit on the setting of the place broadly or the visual setting of B10 from the inclusion of lower density development in Stages 66 and 67, and accordingly there is no change proposed to the densities of Stages 60, 66 and 67.

- *Further information is requested regarding the use of a landscape buffer and/or street tree planting between the Farm Outbuildings precinct and proposed adjacent residential areas.*

Street tree plantings are determined by Council's landscape department and are generally imposed at the time that a planning permit is granted via conditions on the permit. The detailed engineering design of road cross-sections incorporates landscaping and other servicing requirements and measures. Council in their assessment of the detailed landscaping plans will abide by their Landscape Guidelines 2010. The guidelines state that the street/neighbourhood character take into account the existing themes in streets such as fence types or heights, tree species and scale and pavement details and colours. The heritage attributes and in particular the character of the 'Grey Box Woodland' will be taken into account when street tree planting is determined. The lodgement of documentation detailing the street tree planting could be required by a permit condition.

- *Additional information is requested regarding the feasibility of proposed Lot 69 (Residential Heritage Site) as a single residential parcel. The scale, condition, and maintenance obligations associated with the homestead and outbuildings may prove onerous for a single residential owner. It is noted that the reasonable economic use reporting mentions potential commercial use of this lot and heritage buildings.*

There are a number of heritage reasons for the provision of the Residential Heritage Site (Lot 69) as a single lot, comprising the homestead within an ornamental garden, associated outbuildings, and front paddock. The homestead precinct is identified in the *Exford Homestead Conservation Management Plan (CMP)* as an area of primary significance. The CMP policy for subdivision of land of primary significance is as follows:

The significance of the Exford Homestead derives in large part from the survival and enduring legibility of the 1840s and 1850s buildings and elements associated with the site's use and operation by Simon Staughton. There is limited potential for future subdivision in areas of primary significance without unreasonably impacting on the property's identified values.

Subdivision of the homestead precinct is specifically discouraged in the CMP. The close proximity of all outbuildings and landscape features grouped together with the homestead building, and the legibility of the historical planning arrangement would be adversely impacted by the subdivision of this lot.

It is impossible to anticipate the financial circumstances of a future owner of this lot, however the provision of Lot 69 as a single residential parcel has been guided by the CMP policies. The proposed suite of conservation and new works to the registered buildings will address the immediate conservation, repair and amenity requirements and the ongoing maintenance obligations would be made clear to any new owner as part of the sale of this Lot.

- *A proposed subdivision plan overlaid on an aerial photograph must be provided.*

A subdivision plan overlaid on an aerial photograph of the registered place accompanies this submission.

Staging of Works

The Heritage Impact Statement (HIS) indicates that a detailed staging plan could be prepared in response to a potential permit condition to allow for conservation works to occur in concert with settlement of lots in a staged manner. However, it is standard practice for all conservation works to be completed prior to subdivision, or alternatively secured through a Bank Guarantee. A deviation from this approach may be considered only where a clear and justified staging proposal is provided. The use of progressive Bank Guarantees may be considered, subject to agreement on staging.

- *Please provide a detailed staging plan showing the timing of all proposed conservation works in relation to the subdivision staging outlined in the Project Staging table (Report on Reasonable or Economic Use Report ('Gibbins Report'), p.14).*

There are a total of 101 residential lots in the proposed subdivision of Exford Homestead, including the two multi dwelling sites. Recognising the importance of ensuring the completion of all proposed conservation works, but also addressing the economic considerations that the proposed residential subdivision will generate the funding necessary for the documented conservation works, a staging proposal has been prepared which will allow for the settlement of the majority of the residential lots only after the staged completion of the proposed conservation works. For flexibility in the residential development of the site relating to the civil works program, the proposed staging is provided as follows by way of a number of lots rather than relating to specific lots, with the conservation works completed over two stages:

- Stage 1 – Sale of initial 18 lots
- Stage 2: Conservation works to homestead precinct/complex prior to Statement of Compliance of 45 lots
- Stage 3: Conservation works to farm buildings precinct/complex prior to Statement of Compliance of 38 lots

In simple terms, the staging proposal would allow for 18 lots only to be titled and sold in the first instance, followed by 45 lots to be titled and sold only on the condition that all documented conservation works to the homestead precinct are completed to the satisfaction of the Executive Director, Heritage Victoria. The final 38 lots will only be titled for sale once all of the conservation works to the farm buildings precinct are completed to the satisfaction of the Executive Director, Heritage Victoria. This will ensure the full suite of conservation works are undertaken early in the works program and completed well ahead of the settlement of the majority of the residential lots.

Conservation Works Scope and Cost Estimates

There are concerns regarding the proposed use of concrete slabs to stabilise bluestone walls (B2, B7, B8 and B10), rather than underpinning or other, less impactful interventions. This approach is not generally supported as it has the potential to affect the integrity and performance of the original fabric, and is not consistent with best-practice conservation approaches.

There is also concern regarding the proposed demolition of B3 Servants' quarters.

- *Further justification is required, including advice from a suitably qualified heritage structural engineer. Alternative methods should be explored that prioritise the retention and stabilisation of original material, while ensuring its ongoing protection. A requirement to develop a less impactful intervention to stabilise these buildings may form a permit condition should the application be approved.*

A detailed survey of the existing ground and footing conditions was undertaken by Mark Paterson of BCE Design, with the following response provided:

Underpinning of footings is only effective in improving the performance of existing foundations if they are currently founded in poor quality material and it is feasible to underpin to a deeper, more stable founding material. In the case

of buildings B2, B7, B8, and B10, the existing founding material is consistent until basalt is encountered, which is too deep for underpinning to be feasible. Therefore, if underpinning was pursued, the buildings would still be founded in the same material and would not result in any improved stability.

The movement cracks that have been observed are not caused by inadequate founding capacity but in variations in moisture content causing ground volume change. Such changes are not able to be accommodated in brittle bluestone or brick materials. Therefore, the more effective solution is to address ground moisture through improvements in site drainage, as documented.

Bluestone footings have limited capacity to span and deform before cracking. The introduction of new concrete footings adjacent to the existing bluestone footings is an effective way of providing supplementary capacity to withstand movement and stress. The new footings would be connected to the original footing and perform as a single element. Considering the limited spanning capacity of the bluestone, undertaking temporary excavation works below the footings in order to underpin would not be recommended, and is likely to cause further damage to the original structure.

- *You may wish to provide additional information to support the proposed demolition of B3 Servants' quarters.*

The Servants' quarters (B3) is a small 1930s addition to the western end of B2. The 1930s structure is in very poor condition due to rot and termite damage and its partial collapse has contributed to further deterioration of the original Kitchen (B2). The extent of damage caused by the collapse of B3 is particularly evident where the original fabric of B2 has been modified through the introduction of new openings.

Recognising that B2 dates from the 1840s and is fundamental to an understanding of the arrangement of the original homestead complex, the demolition of B3 is proposed to support the conservation and restoration effort to the adjacent original Kitchen (B2) and return this structure to an improved condition, including infilling of non-original openings. B3 is one of a number of 1930s additions to the property. Its physical impact on B2, its ruinous condition, and its more marginal significance when compared to the 1840s buildings is such that heritage impacts on the registered place resulting from the demolition of B3 as proposed are mitigated in large part by the resulting greater extent of conservation and restoration works to B2. It is not considered that the demolition of B3 will result in an unacceptable impact on the appreciation or understanding of the later (1930s) phase of development at the place.

The cost estimate prepared by Melbourne Quantity Surveyors has been reviewed. The following clarifications and updates are required:

- *Costings must distinguish between conservation works and new works to the heritage lots. Costs associated with new works (e.g. additions, speculative fit-outs) should not be included in the heritage costings.*

The Cost Plan that was submitted with the application for a fee waiver for P39339 differentiates between the conservation works and the proposed new works to the registered buildings, and confirms the vast majority of the total cost estimate is directed to conservation works (in the order of 88% of the total cost estimate). However, on the basis that the new works are also proposed to support and provide for the ongoing use of the registered buildings, the total cost for all proposed works is reasonably included in the cost estimate and financial analysis of the proposal.

The cost estimate for the homestead (B1) includes necessary works for site preparation and external services (sewer, water, fire, gas, electrical and communication), as well as new works associated with upgraded kitchen and bathroom facilities, all of which are necessary to ensure the building is safe, habitable and saleable. Limited new works are also proposed to buildings B8 and B10, as well as external services to all buildings which are necessary to support their ongoing use and conservation. On this basis, it is not considered reasonable or appropriate that only direct and immediate conservation works be included in the cost estimate or considered in the financial analysis for the proposed works.

- *The cost estimate and therefore Table 3 – Heritage Works Cost Estimate (Gibbins Report, p.19) must be revised to reflect only the conservation works expected as part of this permit application. Any new works (e.g. glazed skillion addition to the B10 Barn/coach house) should be removed from the estimate.*

As above, it is not considered necessary or appropriate to remove any of the proposed works from the cost estimate or financial analysis of the proposal as all works proposed are directed toward conserving the heritage buildings and supporting their ongoing use. It is noted that the full extent of all proposed new works to all of the registered buildings within the place make up only 12% of the total cost estimate.

- *Roofing works are noted. Please confirm that galvanised iron will be used for roof replacement works, not Colorbond, in line with discussion on site and best practice.*

We confirm our discussion on site that the roof is to be replaced with Z600 Heritage Galvanised sheeting.

- *The Gibbins Report (p.27) notes that funds have already been expended on urgent conservation works. Please provide a detailed list of completed works, including descriptions, dates, and any supporting documentation.*

A review of records held by the owner regarding conservation works that have been undertaken within the registered place includes the following works. It is noted that Heritage Victoria, including the Enforcement team, have previously attended the site and provided correspondence with regard to addressing some of the works identified below.

- 2005 Rectify Flooding
- 2005 Termite Treatment
- 2005 Remove Fire Hazard and Rubbish
- 2008 Asbestos Removal
- 2008 Replace and Disconnect Wiring
- 2008 Verandah Repairs
- 2008 Repairs to Western Pavillion, Roof and Finials
- 2012 Repairs to Coach House
- 2018 Repairs to Western End of House

The cost of these works has been considerable and demonstrates that the current owners are maintaining the fabric of the buildings and attending to urgent repair items to ensure the buildings are generally in a safe and manageable condition.

The wholesale suite of conservation works proposed as part of this permit application has been prepared in response to a comprehensive assessment of the current condition of the registered buildings and are documented to ensure the buildings maintained in a structurally sound and watertight condition.

Approach to Ruinous or Collapsed Structures

There are concerns regarding the proposed treatment of partially collapsed or ruinous heritage structures:

- *In particular, the proposed scope of dismantling works to B12 Blacksmith's Forge appears excessive. Given that the gable ends and chimney stacks remain, there is potential to retain and stabilise more of the existing fabric. This would allow for a more effective interpretation of the structure's original form and scale.*

The dismantling of the blacksmith's forge and cottage includes the retention and stabilisation of all existing walls to approximately three courses, including evidence of all openings and the retention of all extant window sills. This will

allow for an understanding of the layout of the building, including chimneys and window locations. Extensive and visually intrusive intervention into the extant fabric would be required to retain additional fabric and support the chimney stacks and gable ends. Such approaches are likely to include the introduction of contemporary steel framework and propping as a minimum. If the entire structure was to be rebuilt, it would need to comply with all current Australian Standards and National Construction Code requirements, notably including AS11740.4: 2004 *Structural design actions – Earthquake actions* which requires seismic restraint such as additional ties between masonry elements. Not only would this diminish the understanding of the original structure, but the cost of the works would also not be justifiable given the buildings would remain unoccupied.

It is considered that appropriate interpretation could be introduced that would provide an understanding of the form of this building, as well as an archival photographic record completed of the current condition of the building prior to the commencement of any works.

In its current condition, and in considering the potential for adverse physical and visual impacts from any supporting structure, it is not considered that there is a reasonable opportunity for the successful and meaningful retention of more of the ruinous building fabric, or that this would result in a greater understanding of the blacksmith's forge and cottage than the works as currently proposed.

- *The proposed scope of dismantling works to B9 Gardener's Cottage should also seek to retain and stabilise more fabric.*

As above, on the basis of the condition of this building and likely requirement for extensive intervention and visually intrusive supporting structure, it is not considered that the retention of additional building fabric would result in an improved heritage outcome or understanding of the former gardener's cottage.

- *Greater consideration should be given to increased retention and stabilisation of remaining elements rather than removal. A revised approach is recommended at this stage, noting that a requirement for greater retention of fabric may form a permit condition should the application be approved.*

When balanced against the level of intervention and change required to retain and support additional fabric and the cost associated with these works, it is considered that the combination of the retention of physical evidence of these buildings as proposed and a robust interpretive response is an achievable and successful heritage response. This approach would not be appropriate for the other more substantial and intact bluestone buildings forming part of Exford Homestead, however it is suggested that a more nuanced response can be reasonably considered on the basis of the ruinous condition of these buildings without unacceptable impacts on the registered place.

New Works

- *A reduction in the scope of new works (e.g. glazed skillion addition to the B10 Barn/coach house, breakfast room addition and new kitchen fitout to B1 Homestead) is recommended. Final use of the buildings is not confirmed, and therefore the extent of proposed new works may be premature at this stage. Reallocation of funding toward conservation works would support a stronger heritage outcome. Costs saved by reducing new works should be redirected to the approach to ruinous or collapsed structures and alternative methods for stabilising bluestone walls.*

The requirement and reasonable expectation for a small scope of limited new works to the registered buildings to support a future, and ongoing use and occupation of the place, is addressed above, with further explanation provided supporting the conservation/stabilisation works scope as documented for the registered building. It is essential that Building B1 (Homestead) is habitable and attractive to potential purchasers as its restoration effectively supports the conservation effort to the other outbuildings. In terms of the proposed new works to this building, the existing kitchen and verandah annexe arrangement is not functional and is in poor condition. Additionally, the proposed

breakfast room and laundry – sensitively recessed below the verandah and restoring legibility of the verandah posts – is considered a positive heritage outcome. The new works are limited in scope to ensure the buildings are habitable and occupiable, as it is acknowledged that if the buildings are not occupied there is a risk of future vandalism.

- *The application proposes bringing the heritage buildings to a “warm shell” condition. Clarification is sought on this approach, including what work has been done to confirm the future uses of the heritage lots. Consideration should be given to a “cold shell” condition, with increased investment in conservation works (to the same value as that currently costed for both new and conservation works to the heritage lots). This would deliver a more appropriate heritage outcome at this stage, and allow greater flexibility in use and new works to future owners.*

Warm shell works are only proposed to B8, B10, and the Shearing Shed (outside of the extent of registration).

Associated works including the installation of new sarking and insulation to the roofs, and connection to an electrical supply are works required to support any future adaptation of these buildings (B10 and Shearing Shed). These works are not tied to a particular use, and are required to be undertaken as proposed regardless of the type of future use. Not completing these works as part of this package would result in costly abortive works being undertaken (i.e. roof replacements which would need to be lifted at a later date). In addition, the glazed addition to B10 is designed to assist with the ongoing structural integrity of the building by propping the west wall and tying into the end walls when temporary propping is removed.

In the case of B8, the construction of a new bathroom does not result in any negative impacts to original fabric, with all fixtures and fittings to be installed to new timber-framed fibre cement sheet linings. These are not high-cost works, and they are directed to improving the amenity of the site.

The delivery of the buildings as ‘warm shells’ enables flexibility for the future use of the building and does not preclude future works/fitouts to support adaptation (which would be the subject of a future approval application to Heritage Victoria).

- *A reduction in new works should provide the funding to achieve other heritage outcomes sought above, including the approach to ruinous/collapsed structures, less impactful interventions to stabilise bluestone walls (B2, B7, B8 and B10) and retention of B3 Servants’ quarters.*

The proposal is for an extensive and comprehensive suite of conservation works, balanced against a proportionally very small scope of demolition and necessary new works that have been carefully considered and sensitively designed to support a successful future, and ongoing, use of the registered place. It is considered that the total scope of proposed works has had appropriate regard to the heritage values for the place and appropriately addresses the collection of buildings forming part of Exford Homestead, prioritising the retention and undertaking of an extensive scope of conservation works to the majority of the registered buildings to ensure these are watertight and structurally sound. Where a different outcome is proposed (i.e. partial or full demolition of a small number of buildings), the proposal has carefully considered the existing condition of these structures, the relative contribution of each to the State heritage values of the place and the potential for heritage impacts resulting from extensive physical intervention should retention of additional existing fabric be attempted. A response to support the currently proposed stabilising approach is provided above.

Archaeology

The area in the vicinity of the former Watton's Cottage site is considered to be of high archaeological significance and potential. Historical archaeological artefacts that are likely to date to the mid-19th century occupation of the place have been identified across this part of the site.

For areas where subsurface works are proposed, particularly outside the southern portion of the site, archaeological values will be managed through the permit process. If the application is approved, this will likely require:

- *An Archaeological Management Plan (AMP) prior to commencement of works. You may wish to submit a draft AMP at this stage for early consideration as part of the permit assessment process.*
- *Site induction for relevant personnel to ensure awareness of potential archaeological values.*
- *Monitoring of subsurface works by a qualified archaeologist in defined areas that may contain significant archaeological remains.*

The Site of Dr Walton's residence (F1) is recognised for its archaeological potential and there are no current plans to disturb the area. Accordingly, an archaeological management plan for this area specifically is not considered necessary.

The potential for historical archaeological remains otherwise within the registered place, in particular surrounding the heritage building complex, has also been recently raised as outlined in the HIS submitted with the permit application. It is noted that the balance of the place, outside of the area of homestead precinct and farm buildings precinct, has been assessed as being of low historical archaeological potential. It is acknowledged that the archaeological values of Exford Homestead will need to be managed through the permit process, and this is anticipated as a condition of any permit issued for the place.

Interpretation

The proposal includes limited detail on interpretive measures. Elements such as delineation of the original driveway alignment (e.g. through planting) will likely be required under permit conditions should the application be approved. This information may be submitted now if preferred.

The preparation of an interpretation strategy to support an understanding of the heritage values of Exford Homestead as part of any subdivision of the registered place will need to be considered in the context of the overall budget for the site subdivision. It is a requirement which is anticipated as a condition of any permit issued.

I trust the information submitted provides the additional information as requested, but please contact the undersigned on (03) 9667 0848 or at mknehans@lovellchen.com.au should any additional information be required.

Yours sincerely
LOVELL CHEN



Michelle Knehans
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