

PERMIT APPLICATION

**Exford Waters Estate Development
Report on 'Reasonable
or Economic Use'**

Prepared for Wegg Pty Ltd

July 2025

Prepared by Rodger Gibbins

Urban Economist and Planner

This report has been prepared for:

Wegg Pty Ltd
ABN 63 005 302 643

It has been prepared by:

Rodger Gibbins,
Urban Economist and Planner
ABN 12 921 272 489

This report version has been redacted to keep confidential sensitive commercial material.

Disclaimer

This report was prepared by Rodger Gibbins for Wegg Pty Ltd on the understanding that users exercise their own skill and care with respect to its use and interpretation. Any representation, statement, opinion or advice expressed or implied in this publication is made in good faith. Rodger Gibbins is not liable to any person or entity taking or not taking action in respect of any representation, statement, opinion or advice contained herein. This report is not a feasibility analysis.

TABLE OF CONTENTS

Executive Summary	i
Reasonable Use	ii
Economic Use	ii
1. Introduction	4
1.1 The Brief	4
2. The Site	5
2.1 Location	5
2.2 Background	6
2.3 Site Description	7
2.4 Heritage Significance	7
2.5 Planning Framework	8
Zoning.....	8
The Exford Homestead Conservation Management Plan.....	9
Heritage Impact Statement (Lovell Chen, April 2025) (HIS)	9
Toolern Precinct Structure Plan.....	9
Urban Design Framework Plan (UDF).....	10
Design Guidelines.....	11
2.6 Building Condition	11
3. The Proposal	13
3.1 Intent	13
3.2 The Development Plan	13
3.3 The Subdivision	15
3.4 Conservation Works	16
3.5 Landscape Works	17
4. Financial Analysis	18
4.1 Approach to Financial Analysis	18
4.2 Costs	18
4.3 Revenue	22
4.4 Results	23
4.5 Key Assumptions and Risk	23
4.6 Interpretation of the Results	24
5. Reasonable Use	25
5.1 Meaning of ‘Reasonable Use’	25
5.2 Can the Place be Used Without the Proposed Changes?	25
5.3 Matters for Consideration	25
The historic, recent and current uses of the registered place or object.....	25
Other compatible uses of the registered place or object.....	26
The context and setting within which the place or object is located.	26
5.4 Is the Historic Use Obsolete?	26
5.5 Are Standards an Issue?	26
5.6 Conclusion on Reasonable Use	26
6. Economic Use	27
6.1 Meaning of ‘Economic Use’	27
6.2 Financial Circumstances of the Owner	27
6.3 Will the Proposal Facilitate an Economically Sustainable Use Going Forward?	27
6.4 Would Refusal Limit Capacity to Cover Outgoings on a Property?	28
6.5 Conclusion on Economic Use	29
References	1
Attachment 1 – Sales Revenue Estimate	2
Attachment 2 – Comparable Sites Details	3
Attachment 3 - Summary CV	4

Rodger Gibbins, Urban Economist and Planner	4
Qualifications	4
Expertise.....	4
Selected Relevant Project Experience on ‘Reasonable or Economic Use’	4

List of Figures

Figure 1 – Location of the Subject Site	5
Figure 2 – The Subject Site – Aerial Photograph	6
Figure 3 – Extract From Heritage Register	7
Figure 4 - Zoning.....	8
Figure 5 – Urban Design Framework Plan	10
Figure 6 – Homestead and farm Buildings.....	11
Figure 7 – Structures and Grey Box Woodland.....	12
Figure 8 – Proposed Development Plan	15

List of Tables

Table 1 – Project Staging	14
Table 2 – Subdivision Cost Estimate	18
Table 3 – Heritage Works Cost Estimate	19
Table 4 – Estimate of Annual Site Outgoings	20
Table 5 – Overall Costs	21
Table 6 – Lot Revenue Estimate.....	22
Table 7 – Sales Examples	23
Table 8 – Result of Terminal Return Calculation.....	23

Executive Summary

Rodger Gibbins, Urban Economist and Planner, has been commissioned by Wegg Pty Ltd to prepare a report to Heritage Victoria on issues relating to 'reasonable or economic use' arising from Section 101 of the *Heritage Act 2017*. The report relates to the proposed development of the Exford Waters Estate, Melton.

This report principally deals with matters arising from Part 5, Division 2 of the Heritage Act pertaining to 'reasonable or economic use'. It also addresses the Heritage Victoria Policy on Reasonable or Economic Use (June 2021).

The land is located in Melton at the southern extremity of the Urban Growth Boundary. The land hosts a heritage listed Homestead and associated listed farm buildings and a Grey Box Woodland.

The applied zone for the site is predominantly Urban Growth Zone and Immediately adjacent along the Melton Reservoir is a Public Use Zone. The document 'Urban Design Framework' (UDF) provides a 'framework plan for the subject land. The UDF is consistent with the heritage listings and designates land in the northern portion for 'Residential Use'.

Key documents include:

- The Exford Homestead Conservation Management Plan (2020) Lovell Chen.
- Draft Heritage Impact Statement (April, 2025) Lovell Chen.
- Toolern Precinct Structure Plan.
- The Exford Waters Design Guidelines.

The Exford Waters Design Guidelines set out a vision for the estate to be implemented through covenants and a design assessment panel. They deal with building materials, roof design, floor areas, garages, siting, fencing, landscaping and related matters.

The buildings and structures on the site vary in condition from ruinous to fully functioning. While some rectification and stabilisation works have been completed in recent years, the heritage values of the site are under threat. A substantial amount of capital must be generated to actively conserve these assets, and this is a matter of urgency.

The intention is to develop the estate in accordance with the principles laid down in the planning scheme, specifically in the UDF. Importantly, the proposal includes restoration, and conservation works on the listed heritage assets.

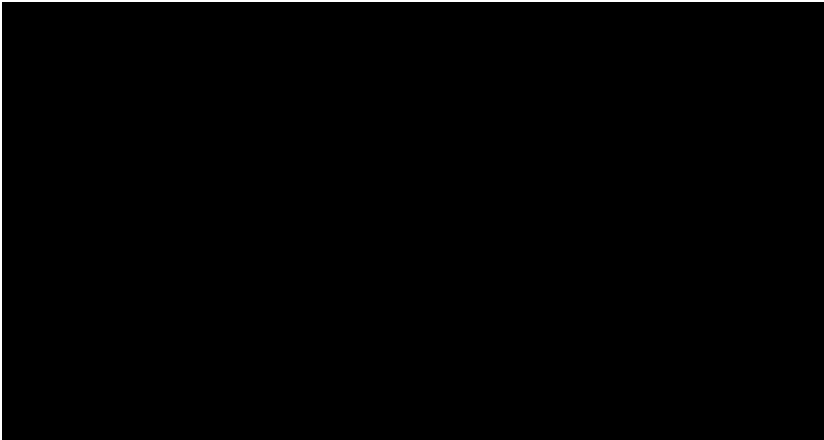
It is intended that the residential development for 101 lots in the northern portion of the site will generate the significant funding that is required for the intended conservation works, in addition to the substantial related initiatives that are unique to this land and not generally experienced when developing other sites. Hence a balance must be struck between the financial viability of the overall development and the achievement of conservation objectives.

A development plan has been prepared as guided by the Conservation Management Plan. The Development Plan is in substantial alignment with the land uses and activities that are set out for the various precincts in the UDF. 77 residential lots and 24 medium density lots are proposed for the northern portion of the site (23% of the total site area).

The conservation works to the Homestead and farm Buildings precincts are extensive and have been costed at [REDACTED] million (exclusive of on-costs and GST).

The brief for this report is to provide a financial analysis which models costs and returns. The approach adopted is based on the 'terminal return' method where Gross Revenue is estimated, the Total Cost is estimated and the difference between is expressed as a percentage of the cost.

The result of the financial analysis is shown below.



The margin on the development is minimal at [REDACTED] (10% is the industry standard for a minimum margin). The reasons for the small margin include the fact that the land available for residential lots is only 23% of the total site area and there are costs associated with the balance of the site.

Recognising the modest margin involved, the proposed development is to be staged with the conservation works to be delivered progressively commencing after the sale and settlement the first stage of the subdivision. The sale and settlement of subsequent stages of the subdivision is to be linked to completion of staged conservation works. There is no scope for bringing forward the conservation works while preserving viability. Similarly, there is no scope for providing bank guarantees for the conservation works as the cost of these would render the project unviable.

Reasonable Use

On the basis that the use for residences in the northern part of the site is identified as being appropriate in the UDF, and this has been given statutory effect in the Melton Planning Scheme, this use is eminently 'reasonable'. The UDF ensures that an appropriate context and setting for the heritage assets will be achieved.

Use of the homestead house as a dwelling or commercial use such as hospitality, the bluestone barn for a commercial use (e.g. brewery or café) are deemed to be appropriate and compatible with the heritage values of these buildings and are therefore 'reasonable' uses going forward.

The likelihood of an alternative use (to the proposed residential development in the northern portion of the site) being attracted that can generate the funds to refurbish the heritage assets is remote indeed. There is therefore an urgent requirement to commence the proposed reasonable use to save these assets from oblivion.

Economic Use

To be consistent with Heritage Victoria Policy the financial circumstances of the current owner are not a consideration, hence there is no consideration of financial hardship nor external financial resources.

The registered place in its current state is not an economically sustainable situation. The current use does not generate sufficient income to cover the considerable outgoings for the site. The heritage assets have degraded over time and continuation of the current use, or any other use that does not generate funds for conservation works, will result in continuing degradation.

The proposal to create 101 residential lots in the northern portion of the site, in accordance with the statutorily approved Urban Design Framework, creates a potential to generate the necessary funds for urgently needed conservation works. The project is on the margin of financial viability, but it presents a unique opportunity to achieve an appropriate conservation outcome.

The calculated margin for the overall development (██████) falls short of a target of 10% which leaves little room for downside risks that are potentially associated with possible cost overruns and/or revenue shortfalls. There is no scope for programming the conservation works in advance of lot production or for expensive bank guarantees.

1. Introduction

1.1 The Brief

Rodger Gibbins, Urban Economist and Planner, has been commissioned by Wegg Pty Ltd to prepare a report to Heritage Victoria on issues relating to 'reasonable or economic use' arising from Section 101 of the Heritage Act 2017 (see text box below). The report relates to the proposed Permit Application

The qualifications and experience of the author are summarised in Attachment 3.

This report principally deals with matters arising from Part 5, Division 2 of the Heritage Act pertaining to 'reasonable or economic use'.

This report also addresses the Heritage Victoria Policy on Reasonable or Economic Use (June 2021).

Heritage Act 2017 No 7 of 2017

101 determination of permit applications

- (2) In determining whether to approve an application for permit, the Executive Director must consider the following:
- (a) the extent to which the application, if approved, would affect the cultural heritage significance of the registered place or registered object.
 - (b) the extent to which the application, if refused, would affect the **reasonable or economic use** of the registered place or registered object.

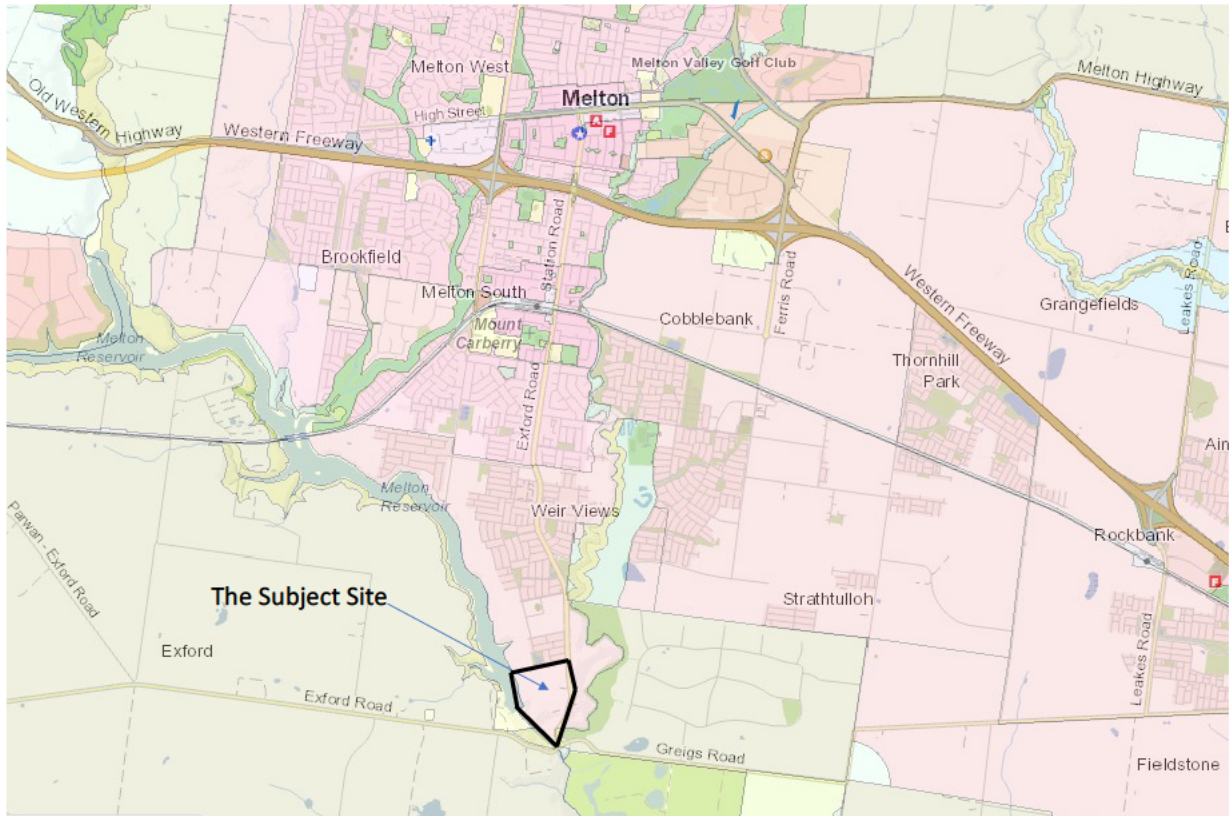
2. The Site

2.1 Location

The subject site (30.5 ha) is located at the southern extremity of the Melton township as shown in Figure 1. The address of the land recorded in the Heritage Database is:

Lot 4B at 355-455 EXFORD ROAD and 655 EXFORD ROAD WEIR VIEWS, MELTON CITY

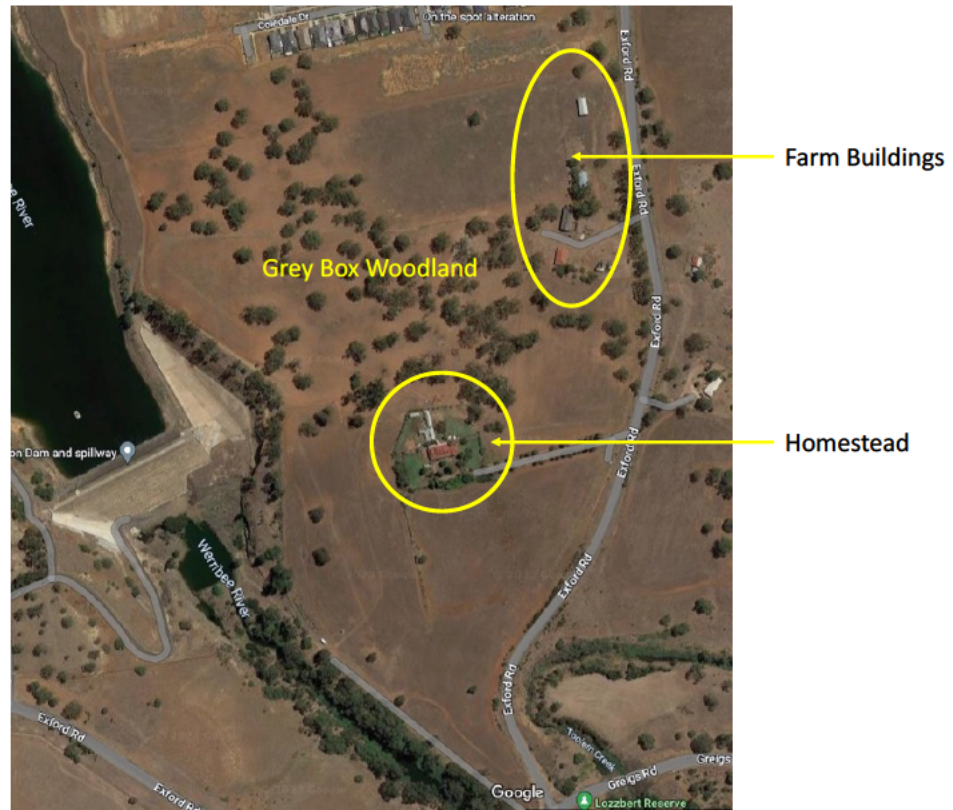
FIGURE 1 – LOCATION OF THE SUBJECT SITE



Source: VicMap

The land is shown in the aerial photograph in Figure 2 overleaf. The figure shows the general location of a heritage listed Homestead and associated listed farm buildings. The Grey Box woodland is also shown. The land is located at the southern extremity of the Urban Growth Boundary.

FIGURE 2 – THE SUBJECT SITE – AERIAL PHOTOGRAPH



Source: Google Maps

2.2 Background

Source: Lovell Chen, April 2025, Draft Heritage Impact Statement (HIS)

The subject property is Exford Homestead, a remnant of a large pastoral estate established by pioneer pastoralist Simon Staughton in 1842. The property comprises an 1840's residence, outbuildings and remnant farm buildings, and associated landscape elements including historic fences and enclosures around the homestead. Two distinct groups of heritage buildings in the property are described in the Heritage Impact Statement as the 'homestead precinct' and 'farm buildings precinct'.

The proposal is for subdivision of the northern part of the subject property (23% of land area) for residential development with associated services and landscaping, and a suite of conservation works to the registered buildings. The subdivision as proposed forms part of the Exford Waters Estate, which is a residential subdivision between Exford Road and the Werribee River to the north of the subject property.

Exford Homestead is included in the Victorian Heritage Register (VHR), designated H0316, and comprises land, buildings and features including gateposts, a bluestone wall and the site of a former residence.

Exford Homestead is also identified as HO2 in the Schedule to the Heritage Overlay of the Melton Planning Scheme.

Works and activities to places included in the VHR require statutory approval in accordance with the Heritage Act 2017. In addition, approval is required pursuant to Clause 43.01-2 of the Melton Planning Scheme for subdivision of a heritage place which is included in the VHR.

2.3 Site Description

See detailed description in Heritage Impact Statement (HIS).

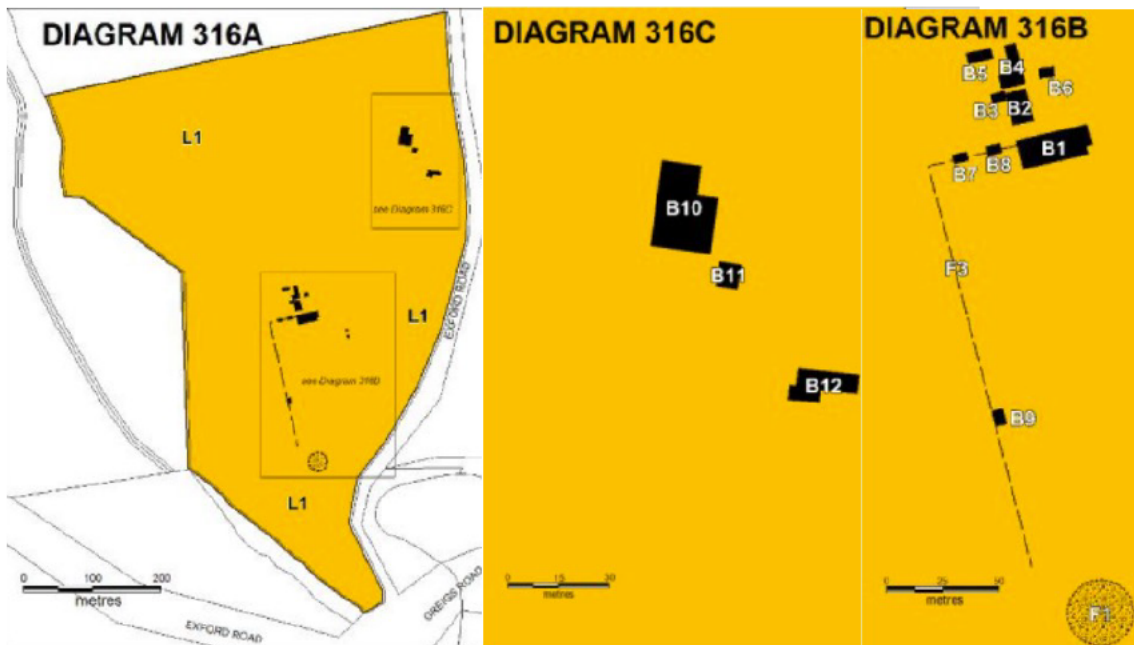
The Homestead Heritage precinct (see Figure 2) contains the homestead dating from 1843 and various outbuildings and structures. There are various landscape elements including fences and gates.

The Farm Buildings Precinct in the northern part of the site contains heritage buildings including a bluestone barn, a blacksmith's cottage and associated structures. There are more recent structures described in the HIS as 'modern ancillary elements'.

2.4 Heritage Significance

The land appears on the Heritage Register Number H0316, registered on October 9th 1974. The registration was amended on December 12th 2013. The land and heritage buildings and structures are located as shown in Figure 3

FIGURE 3 – EXTRACT FROM HERITAGE REGISTER



Source: Heritage Register H0316

The Heritage Victoria Statement of Significance states (in part):

Exford Homestead is one of the oldest residences in Victoria and part of a rare surviving 1840s homestead complex. It is a farming property now comprising approximately 30.5 hectares located 3.5km south of South Melton where sheep have been raised since the earliest phase of European occupation of the Port Phillip District (Victoria). The site was occupied from 1840 by Dr John Watton, a member of the Port Phillip Association, a syndicate of Van Diemens Land colonists formed in 1835 with the aim of establishing pastoral activities on the north shore of the Bass Strait. The place was then part of a large run taken up in 1842 by emigrant landowner Simon Staughton.

Eventually extending for many thousands of hectares, the run was divided into four smaller properties after Staughton's death in 1863. The place retains an early 1840s homestead building and outbuildings constructed of locally hewn timber, mud and lath rendering, brick and local stone. Subsequent additions in locally-quarried bluestone date from the mid 1850s, after security of tenure had been gained, and include a double-height store, a smithy with attached accommodation, two bluestone pavilions and bluestone fence enclosing an orchard. The Staughton 'orb' is carved into the timber posts surmounting the bluestone

fence and gateposts. It is also found in the bluestone pavilions of the 1850s. The extent of Staughton's holding was marked at quarter mile intervals with posts featuring a similar carved timber orb. A suite of timber additions introduced in the 1930s demonstrate a later phase of development at the place.

Exford Homestead is of historical significance for its direct association with the earliest phase of European occupation of the Port Phillip District (Victoria). Exford Homestead demonstrates the political and social changes which affected the Port Phillip District and Victoria in the early years of European settlement. The difference between the early 1840s timber buildings and the more sophisticated bluestone structures reflects increasing prosperity following the gold rushes of the 1850s, and the associated influx of skilled immigrants. The construction technologies and refined materials used in the 1850s bluestone buildings demonstrate that pastoralists were by then willing to construct more permanent buildings with greater architectural pretension due to an ability to obtain secure land tenure.

2.5 Planning Framework

Zoning

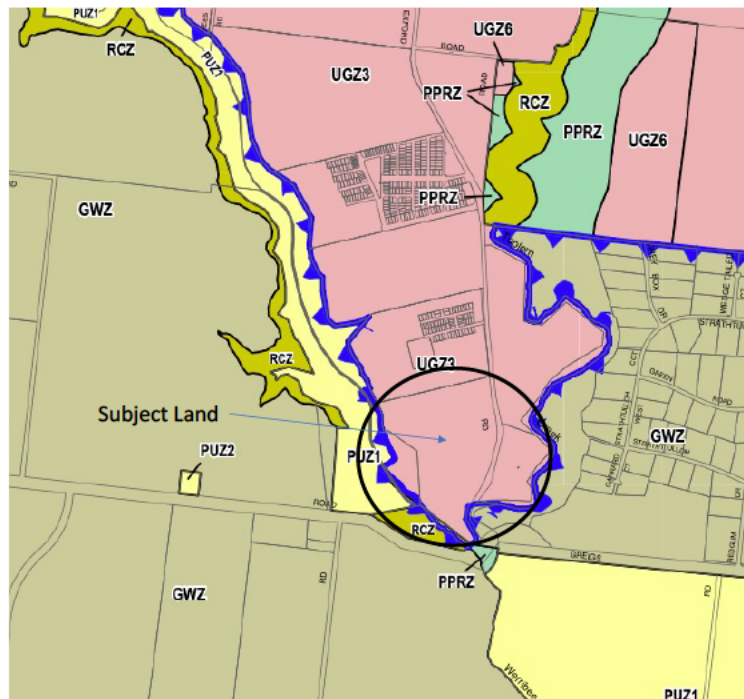
The applied zone for the site is predominantly Urban Growth Zone,. Immediately adjacent along the Melton Reservoir is a Public Use Zone.

Exford Homestead is individually identified as HO2 in the Schedule to the Heritage Overlay of the Melton Planning Scheme. The mapped extent of HO2 is consistent with the VHR extent of registration for Exford Homestead.

The following zones and overlays also apply to the subject property:

- Schedule 3 to Clause 37.07 Urban Growth Zone – Toolern Precinct Structure Plan [refer Section 6.1.1 of this HIS].
- Schedule 1 and Schedule 2 to Clause 42.01 Environmental Significance Overlay.
- Schedule 3 to Clause 45.06 Development Contributions Plan Overlay.

FIGURE 4 - ZONING



Source: Melton Planning Scheme

The Exford Homestead Conservation Management Plan

The Exford Homestead Conservation Management Plan (CMP) was prepared by Lovell Chen in 2020 to establish the nature and extent of the site's cultural heritage significance, and to ensure that the conservation, future uses, adaptation and development of the place have regard for its heritage significance. The CMP is not referenced in the Melton Planning Scheme as either an Incorporated Document or Policy Document, and there is no mechanism for the CMP to be approved by Council or Heritage Victoria except as a condition of permit. Notwithstanding, consideration of the relevant conservation policies in the CMP relating to subdivision is provided in the Heritage Impact Statement. The subdivision as proposed is consistent with these policies.

Draft Heritage Impact Statement (Lovell Chen, April 2025) (HIS)

The draft HIS has considered planning and heritage requirements and has drawn the following conclusions:

"The proposed subdivision of the subject property is anticipated in the local planning framework and is set within a broader area context providing residential development. As relevant to consideration of heritage impacts the directly relevant decision guidelines require consideration of the impact of the subdivision on the significance of the place and the potential for the subdivision to result in development which may have an adverse impact.

The subdivision plan for Exford Homestead is responsive to the significance of the place, and consistent with the urban structure plan set out in the Urban Design Framework prepared and approved pursuant to Clause 37.07 – Schedule 3 of the Melton Planning Scheme. The subdivision as proposed will result in a changed residential context to part of the site, but overall will maintain an understanding and appreciation of the homestead complex in a rural setting, and an understanding of the connection between the homestead and farm buildings precincts. Importantly, it provides an opportunity for the burden of conserving the diverse heritage buildings to be shared rather than falling to a single owner and opens the potential for a range of occupancies and users which might otherwise be unsustainable. As such the proposal is one which accords with the relevant policies and guidelines under the Melton Planning Scheme."

"The residential subdivision of Exford Homestead as proposed has had due regard to the heritage values of the place and provides for a development outcome which recognises and responds to the surrounding urban context and planning framework but manages and protects the elements of the place which demonstrate and contribute to its significance. The subdivision as proposed will result in a changed residential context to part of the site at its northern extent but will otherwise maintain an understanding of the 1840s homestead in a pastoral setting."

Toolern Precinct Structure Plan

The Toolern PSP sets out objectives and guidelines for land use and development that 'must' be met or 'should' be met. The Toolern PSP also determines the use and development controls (including the applied zones – see above) that apply in the accompanying Urban Growth Zone Schedule 3 (UGZ3) in the Melton Planning Scheme.

Regarding the subject land the Toolern Precinct Structure Plan states:

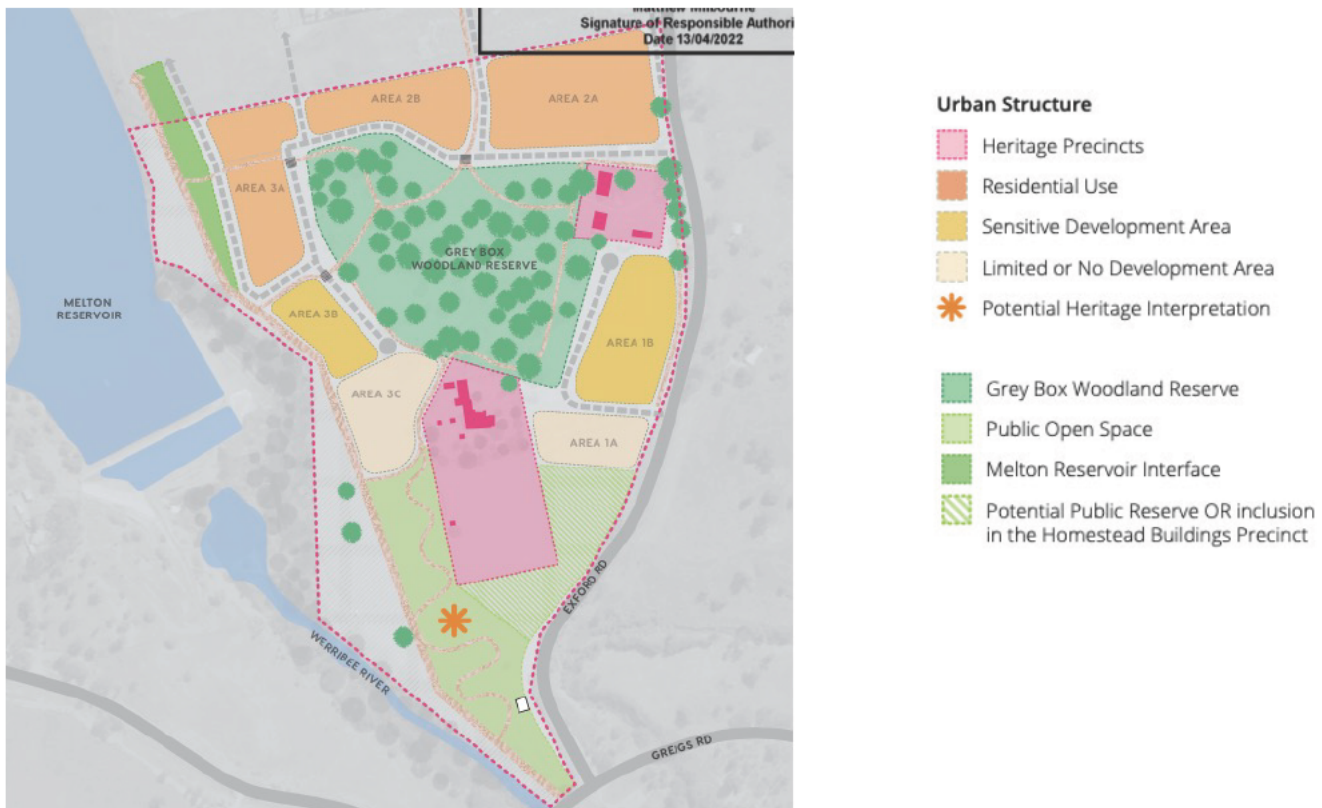
- *Total Area 29.52 Ha.*
- *Road widening 0.26Ha.*
- *Waterway/Drainage 3.82 Ha.*
- *Conservation 2.0 Ha.*
- *Passive Open Space*
 - *4 Ha passive open space located around the Grey Box Woodland Reserve.*
 - *0.22 Ha located along the Werribee River frontage for the shared path corridor.*
- **Total Developable Area 19.29 Ha.**

The UDF will further interrogate the Total Developable Area to take into consideration other factors such as Areas of Heritage Significance.

Urban Design Framework Plan (UDF)

The UDF provides a 'framework plan for the subject land (Figure 4).

FIGURE 5 – URBAN DESIGN FRAMEWORK PLAN



Source: Melton Planning Scheme

The UDF describes land uses and activities for the various precincts (Section 4.2). The descriptions are reproduced in part below:

- Heritage Precincts – It is important that all future development works in the precinct minimise the potential to obscure the historical relationship between the homestead and farm buildings and adversely impact the cultural heritage significance of the Place.
- Residential Uses - Heritage Victoria has indicated that they are comfortable for some residential development to occur to the north of the Grey Box Woodland, to connect to the Exford Waters development.
- Limited or No Development Areas - Development of structures/ buildings in precincts 1A and 3C will be limited. Possible development in this area could include car parking, and minor infrastructure such as paths, landscaping and fencing less than 1.2 metres in height. Any built form must not obscure significant views or interrupt the pastoral character associated with the Homestead. Landscaping and small-scale introduced infrastructure in these precincts should be sympathetic to the pastoral character of the heritage place and be discrete.
- Sensitive Development Areas - It may be possible for limited development to occur in precincts 1B and 3B. Development in these areas should provide active frontages to the Grey Box Woodland, the Farm Buildings Precinct, the Exford Homestead Buildings Precinct, Exford Road, and the Werribee River / Melton Reservoir.
- Grey Box Woodland Reserve - The Toolern PSP requires the provision of a 6.0 hectare reserve for the purpose of the conservation of the Grey Box woodland located on the site.
- Public Open Space - The Exford Park will be located in the southern part of the site, in the section abutting the Werribee River. This area will remain as open paddocks and grassland, in order to maintain the open, pastoral quality of the significant heritage space, and to protect Aboriginal cultural heritage values.

Sections of this area adjacent to Exford Road may be retained as part of the Homestead precinct, which may be retained in private ownership

The UDF sets out principles for dealing with the Melton Reservoir Interface, Servicing and Infrastructure, the Gas Pipeline and the Drainage Asset.

Given the comprehensive nature of this incorporated document, the UDF becomes an important consideration in determining the 'reasonable use' of the site going forward.

Design Guidelines

The Exford Waters Design Guidelines set out a vision for the estate to be implemented through covenants and a design assessment panel. They deal with building materials, roof design, floor areas, garages, siting, fencing, landscaping and related matters.

2.6 Building Condition

See Figures 6 and 7.

The buildings and structures on the site vary in condition and some of the outbuildings are in a ruinous state. While some rectification and stabilisation works have been completed in recent years, extensive conservation works are required to sustain the place in the long term. A substantial amount of capital must be generated to rescue these assets, and this is a matter of urgency.

FIGURE 6 – HOMESTEAD AND FARM BUILDINGS



Photographs Taken 13th February 2023

FIGURE 7 – STRUCTURES AND GREY BOX WOODLAND



Photographs Taken 13th February 2023

3. The Proposal

3.1 Intent

The intention is to develop the estate in accordance with the principles laid down in the planning scheme, specifically in the Urban Design Framework Plan (UDF). Importantly, the proposal includes stabilisation, and conservation works on the listed heritage assets.

It is intended that the residential development will generate the significant funding that is required for the conservation works, in addition to the substantial related initiatives that are unique to this land and not generally experienced when developing other sites. Hence a balance must be struck between the financial viability of the overall development and the achievement of conservation objectives.

3.2 The Development Plan

A development (subdivision) plan has been prepared as guided by the Conservation Management Plan and the Heritage Impact Statement. The Development Plan is in substantial alignment with the land uses and activities that are set out for the various precincts in the UDF. Those areas identified as 'Sensitive Development Areas' are substantially avoided. The development plan is provided in Figure 8. Features to note are:

- Residential development is proposed for the 'Residential Uses' areas in the UDF.
- Residential development is proposed in only a small part of the 'Sensitive Development Areas' in the UDF where it is stated: *It may be possible for limited development to occur in precincts 1B and 3B. Development in these areas should provide active frontages to the Grey Box Woodland, the Farm Buildings Precinct, the Exford Homestead Buildings Precinct, Exford Road, and the Werribee River / Melton Reservoir.* This comprises a limited extent of subdivision in the northern extent of Area 3B only.
- Residential development avoids areas designated 'Limited or no Development Area'.

The Exford Waters staging of the residential allotments is reproduced in the Table below. The final staging will be developed to deliver the conservation works as integrated into the development stages and as funds become available.

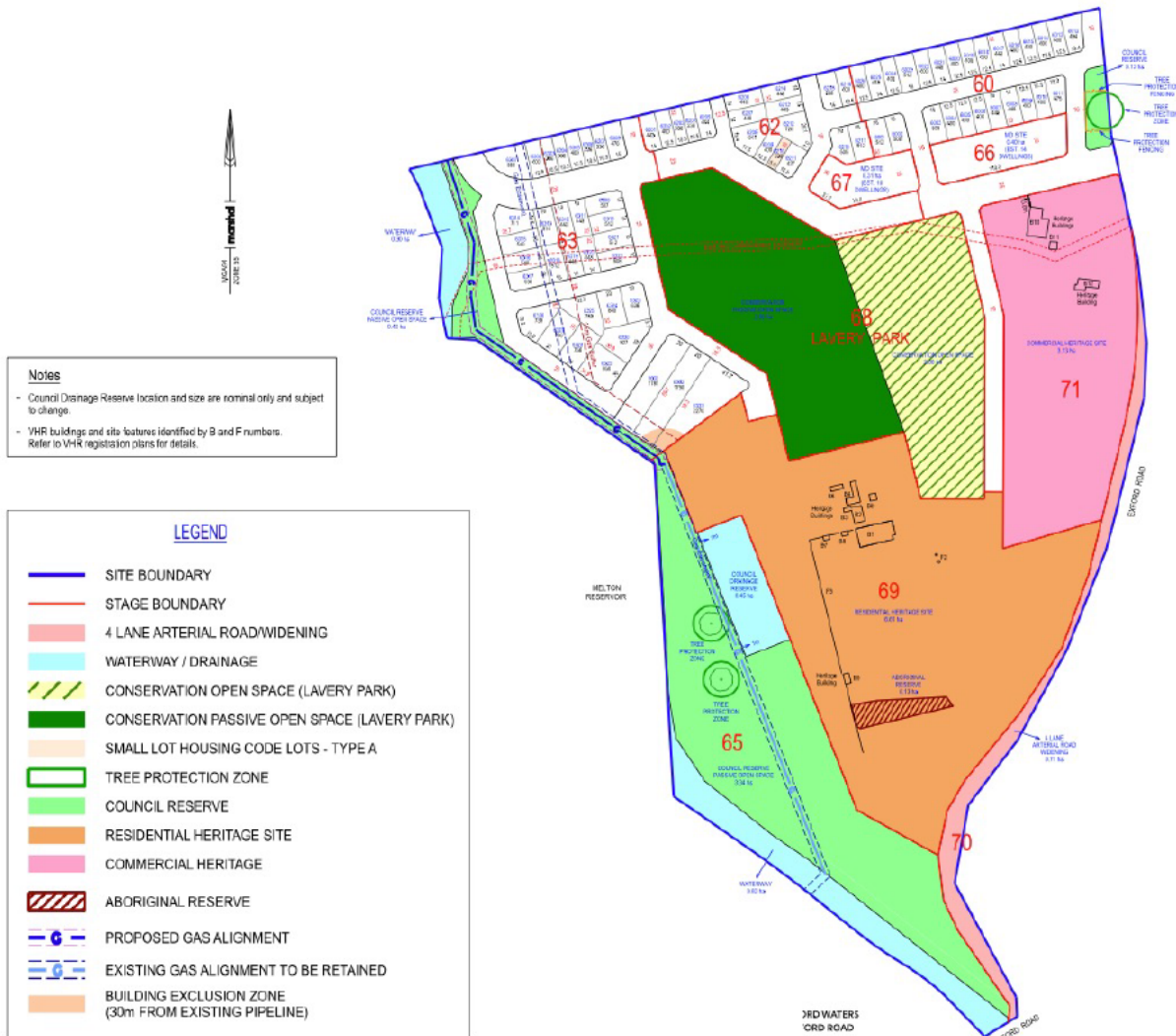
TABLE 1 – PROJECT STAGING

		<u>STAGE BUDGET</u>									
STAGE DELIVERY SEQUENCE		1	2	3	4	5	6	7	8	9	10
STAGE No.	TOTAL	60	62	63	65	66	67	68	69	70	71
TOTAL SITE AREA (ha)	29.57	2.68	1.67	4.61	4.61	0.40	0.31	4.86	6.61	0.71	3.13
4-LANE ARTERIAL ROAD/WIDENING (ha)	0.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.71	0.00
WATERWAY / DRAINAGE (ha)	1.57	0.00	0.00	0.30	1.27	0.00	0.00	0.00	0.00	0.00	0.00
CONSERVATION OPEN SPACE (ha)	2.00	0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00
CONSERVATION PASSIVE OPEN SPACE (ha)	2.86	0.00	0.00	0.00	0.00	0.00	0.00	2.86	0.00	0.00	0.00
COUNCIL RESERVES & TPZ (ha)	3.96	0.13	0.00	0.49	3.34	0.00	0.00	0.00	0.00	0.00	0.00
NET DEVELOPABLE AREA (NDA) (ha)	18.47	2.55	1.67	3.82	0.00	0.40	0.31	0.00	6.61	0.00	3.13
<hr/>											
TOTAL NET DEVELOPABLE AREA (ha)	18.47	2.55	1.67	3.82	0.00	0.40	0.31	0.00	6.61	0.00	3.13
RESIDENTIAL HERITAGE SITE (ha)	6.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.61	0.00	0.00
COMMERCIAL HERITAGE SITE (ha)	3.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.13
ROAD (ha)	3.83	1.42	0.86	1.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CONVENTIONAL RESIDENTIAL LOTS (ha)	4.20	1.13	0.81	2.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MEDIUM DENSITY (MD) SITES (ha)	0.71	0.00	0.00	0.00	0.00	0.40	0.31	0.00	0.00	0.00	0.00
No. LOTS (CONVENTIONAL)	77	26	18	33	0	0	0	0	0	0	0
ESTIMATED No. DWELLINGS (MD)	24	0	0	0	0	14	10	0	0	0	0
AVE. LOT SIZE (CONVENTIONAL) (m ²)	545	433	448	686	0	0	0	0	0	0	0
LOT/DWELLING YIELD (No./NDA ha)	5.5	10.2	10.8	8.6	-	35.0	32.6	-	-	-	-

Source: Marshal

From Table 1 a total of 77 residential lots and 24 medium density lots are proposed for the whole of the site.

FIGURE 8 – PROPOSED DEVELOPMENT PLAN



Source: Marshal

3.3 The Subdivision

The principal elements of the subdivision comprise the following:

Residential heritage site (Area 69)

The residential heritage site (6.61ha) will accommodate the homestead precinct within a single allotment. The site will be provided with vehicle access from the north and will no longer be accessible from Exford Road. No new development is proposed within this area.

Commercial heritage site (Area 71)

The commercial heritage site (3.13ha) will accommodate the farm precinct. The farm precinct buildings are located at the northern end of the area with open space extending to the south. No access is proposed from Exford Road and vehicles will enter the area from new roads to the north and west.

Open space (Area 68)

Combined conservation open space and conservation passive open space areas (4.86ha), are located in the centre of the northern portion of the site. These take in the Grey Box stand of trees and associated open grassland. To be known as Lavery Park, the area will provide recreation space for the residential areas to the north and a substantial visual and physical buffer between that development and the homestead precinct to the south.

Council reserves (Area 65)

To the south-west of the homestead precinct two Council reserves are to be created incorporating tree protection zones. The reserves are located within the important viewshed to the south of the homestead. Other than for inground service works no new development is proposed within this area as part of this application.

New residential lots (Stages 60, 62, 63, 66 & 67)

The new residential lots are to be located to the north and north-west of the site. Development on the lots will be subject to local development guidelines which amongst other matters respond to the heritage setting. New development will be subject to applicable heritage and planning approval requirements, having regard to the planning framework and guidelines including the Urban Design Framework.

New internal roads

The site will be accessed in the north-east corner from Exford Road which is to be widened to a 4-lane arterial road. Existing access drives into the property off Exford Road will be extinguished. Physical works will be the subject of further approvals.

3.4 Conservation Works

The conservation works are described in detail in the HIS. In summary, the works include:

Homestead Precinct

Homestead House (B1)

The main house is to be restored and refurbished for use as a residence. The works include the provision of new kitchen and bathroom facilities and the upgrading of services to meet contemporary needs.

Kitchen and Servant's Quarters (B2 and B3)

The former kitchen is to be restored and made sound for a future use. The works are focused on structural stabilisation, weatherproofing and the introduction of electrical services.

Stable / Garage (B4)

The former stables/garage building is to be restored and made sound for a future use. The works are focused on structural stabilisation, partial recladding and weatherproofing.

Stables (B5)

The former stables building is to be restored and made sound for a future use. The works are focused on structural stabilisation and weatherproofing.

Underground Tank (South) (B6)

The underground tank is to be restored and made sound for a future use. The works are focused on structural stabilisation and weatherproofing.

West Bluestone Pavilion (B7)

The works to the bluestone pavilions include stabilisation of the structures, new flooring, plaster repairs, drainage and weatherproofing.

East Bluestone Pavilion (B8)

As per B7.

Gardener's Cottage (B9)

The gardener's cottage is in a ruinous state and the works involve dismantling of the partially collapsed structure and stabilisation of retained low level fabric.

Entry Gateposts (F2)

The entry gates and fencing will be retained in-situ and restored.

Bluestone Wall (F3)

The bluestone wall and timber fence will be restored and reconstructed.

Farm Buildings Precinct

Bluestone Barn (10)

The barn will be restored and refurbished to enable future adaptation for commercial reuse. The works will include the reconstruction to the east side skillion.

Underground Tank (North) (B11)

The underground tank is to be restored externally and made sound for a future use (not for water storage). The works are focused on structural stabilisation and weatherproofing.

Blacksmith's Forge and Cottage (B12)

The blacksmith's forge and cottage are in a ruinous state and the works involve dismantling of the partially collapsed structures and stabilisation of retained low level fabric.

3.5 Landscape Works

Tree Removal

The proposed subdivision plan establishes a conservation open space to the west of the Farm Buildings Precinct which includes the stand of Grey Box. Most of the existing trees within this stand will be retained within the property and included in the conservation reserve (proposed Lavery Park). Several other trees are proposed for removal to enable the subdivision.

Services

The 'Preliminary Servicing Report for Exford Waters Estate Lot 4B' outlines the expected infrastructure provisions and future requirements for the proposed subdivision. These services comprise drainage, sewerage, water, electricity and telecommunications, and will be tied into the existing service provision for the Exford Waters development to the north.

The works for the provision of services will likely be undertaken progressively, according to the staged development of the subdivision. Detailed design for these works has not yet been developed.

4. Financial Analysis

4.1 Approach to Financial Analysis

The brief for this report is to provide a readily understood simple financial analysis and therefore not to carry out a more complicated discounted cash flow analysis. Accordingly, the approach adopted is based on the 'terminal return' method where Gross Revenue is estimated, the Total Cost is estimated and the difference between is expressed as a percentage of the cost.

This approach must be viewed as being 'indicative' as it doesn't explicitly account for aspects of the 'time value of money' when a project is undertaken over several years. The simplifying assumption is that the distribution of costs and revenues is similar over the timeframe. Generally, a margin of 10% is a minimal return for profit and risk.

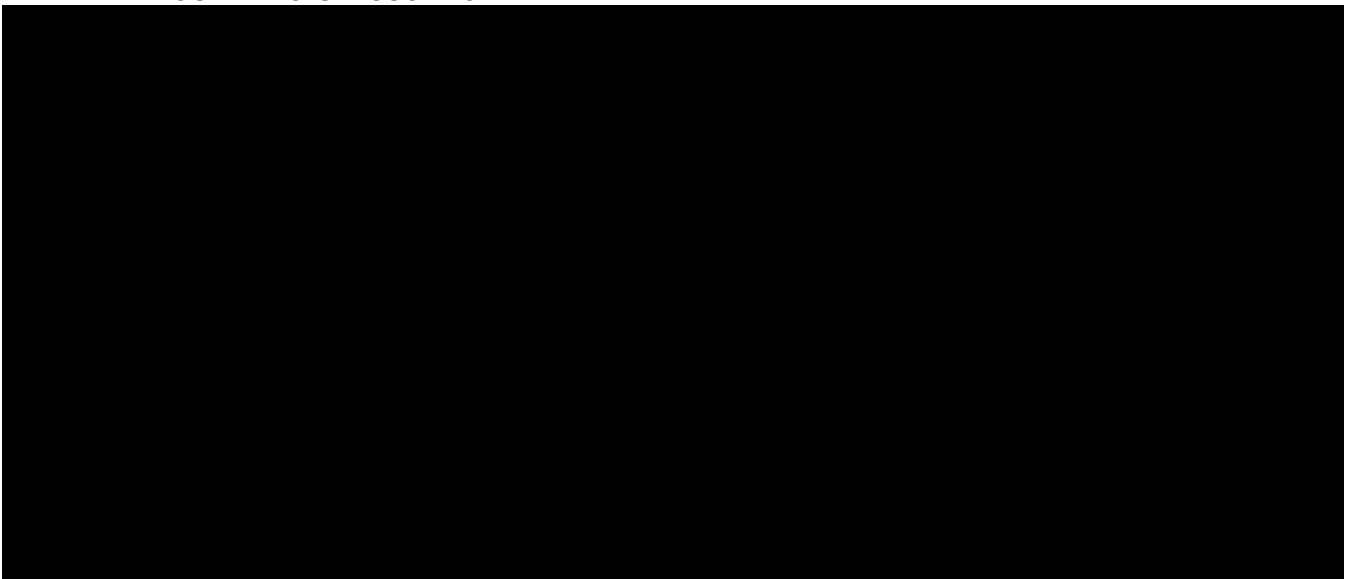
For the purposes of this report, the Terminal Return method is considered to be appropriate.

4.2 Costs

Engineering Works Costs

The subdivision cost estimate for engineering works has been Provided by Marshal (25/02/25). The estimate is summarised in Table 2.

TABLE 2 – SUBDIVISION COST ESTIMATE

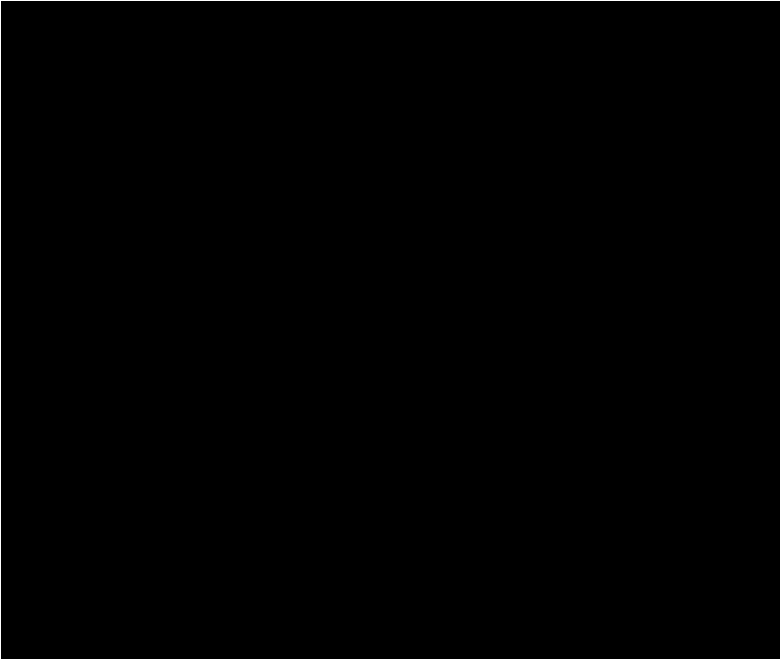


Source: Marshal (25/02/25)

Heritage Works Costs

The heritage works cost estimate has been provided by Melbourne Quantity Surveyors (6/02/25). The estimate is summarised in Table 3. The cost estimate is [REDACTED].

TABLE 3 – HERITAGE WORKS COST ESTIMATE



Source: Melbourne Quantity Surveyors (6/02/25) Based on Lovell Chen Architectural Design.

There are additional cost considerations as follows:

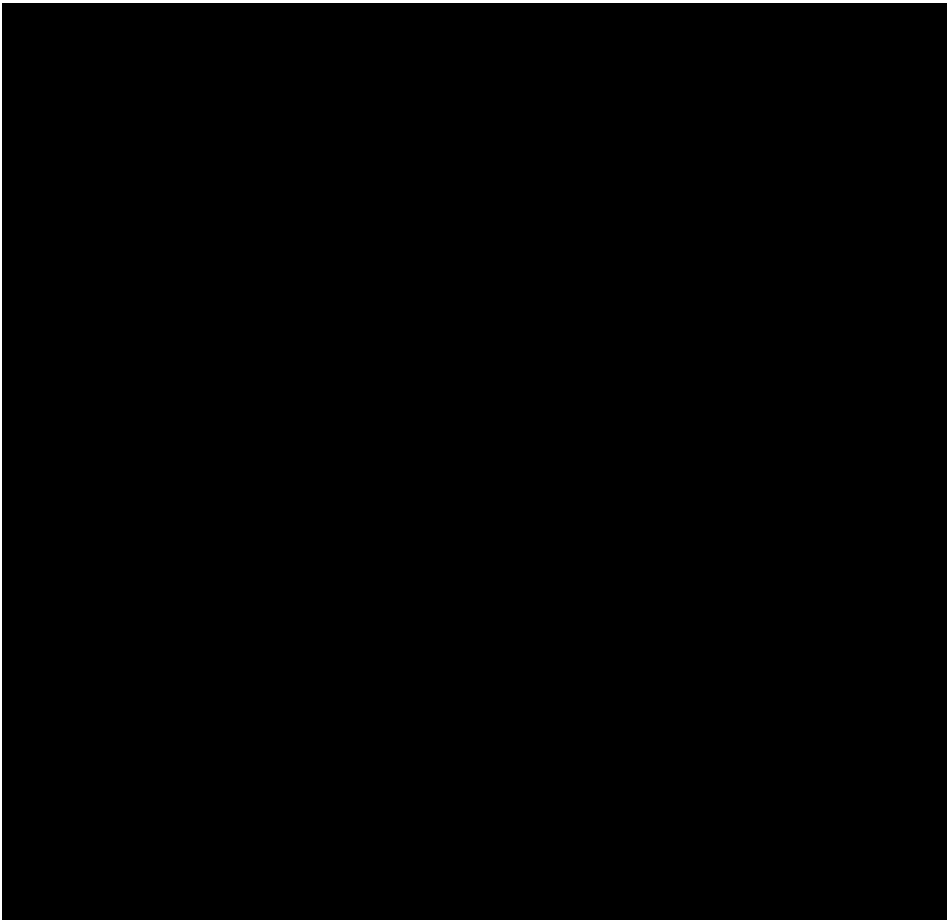
Land Cost

An item that should be included in a feasibility study on a development project is the cost of the land. In a commercial analysis, this is what has been paid for the site. However, in a report on 'reasonable or economic use' the statutory valuation of the land is normally used so that what has been paid doesn't bias the result. The adopted statutory valuation is [REDACTED] (source: Wegg Pty Ltd).

Site Outgoings

The site requires constant monitoring, surveillance and rectification works to address ongoing threats to the heritage assets and for public safety. An estimate of the ongoing costs associated with this work is included in Table 4. The need for this work relates to proximity of the site to housing and the open and unoccupied appearance of the site.

TABLE 4 – ESTIMATE OF ANNUAL SITE OUTGOINGS



Source: Webb Pty Ltd

Webb Pty Ltd advise that this is a conservative estimate of annual site outgoings. In addition, there are issues arising from disruptions by service authorities relating to gas, sewer and water infrastructure and geological testing.

Developer Overheads

A conservative allowance of 5% of development costs is applied. This covers items such as:

- Staff and Office.
- Overheads.
- Insurances.
- Sales Office.
- Fire breaks, rabbit control and mowing.
- Temporary fencing.
- New design guidelines.
- Archaeologist and Aboriginal supervision.

GST

GST is payable at a rate of 10% on revenue from sales. Input credits apply at a rate of 1/11th of costs. This deals with the GST amount that was excluded from the heritage works cost estimate in Table 3.

Interest

Interest cost is calculated at a rate of 7% pa and assumes each stage (from outlay to realisation) is one year. Hence the interest cost estimate is 7% of the cost.

Bonding

Authorities demand a series of bonds for a subdivision project. It is assumed for simplicity that all payments are refunded in due course. In a more detailed analysis this would result in interest costs.

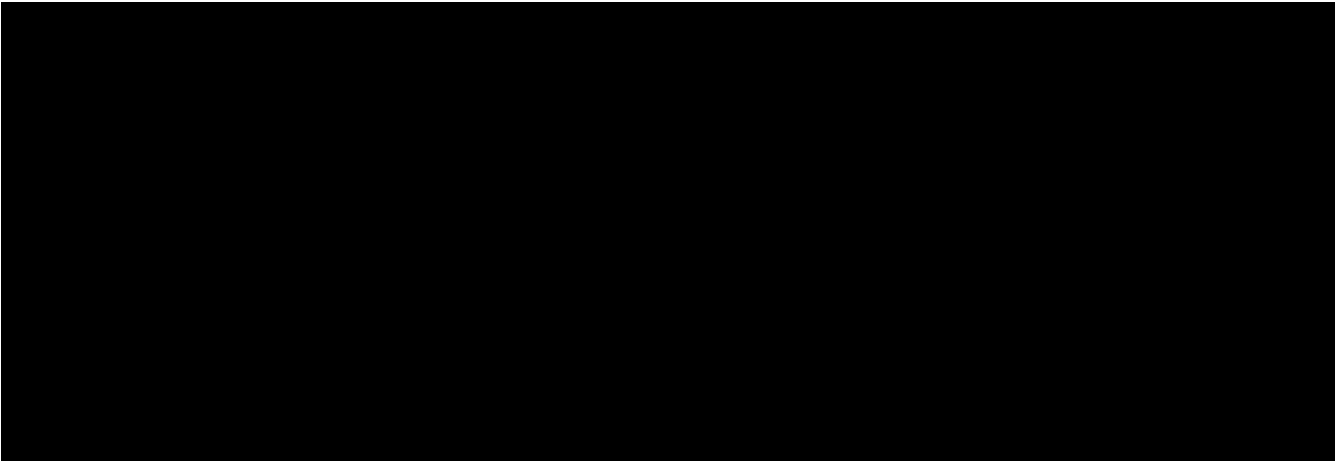
Growth Areas Infrastructure Charge (GAIC)

A GAIC charge has been included in the subdivision costs however there is some uncertainty as to whether the Growth Areas Infrastructure Charge (GAIC) will be applied to the heritage works. If this occurs the cost will be in the order of \$2 million which would severely undermine the viability of the project.

Overall Costs

The estimate of overall costs for the development are shown in Table 5.

TABLE 5 – OVERALL COSTS

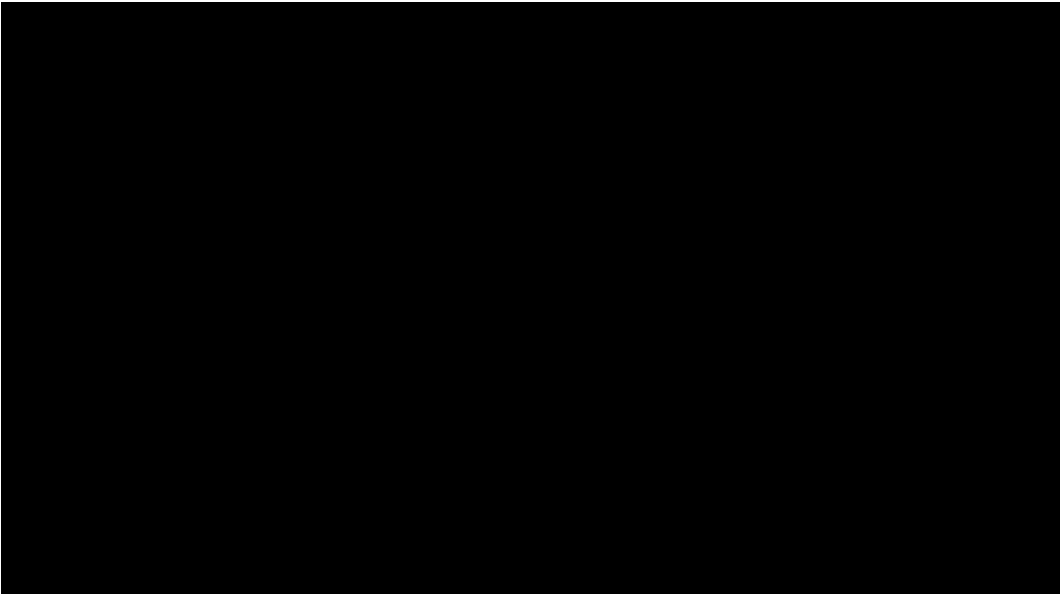


Source: Marshal (25/02/25) and Consultant Calculations

4.3 Revenue

An estimate of sale prices for the lots created by the subdivision and for the heritage buildings is provided in Table 6.

TABLE 6 – LOT REVENUE ESTIMATE



Source: RPM and Consultant research for heritage buildings.

Research into the likely sales prices for the heritage buildings sites (Attachment 2) is summarised in Table 7.

In the table it can be seen that Urban Growth Zone land for smaller sites is priced at around \$2.4m per ha. In contrast, Green Wedge Zone land is priced around \$1.214m to \$1.36m per ha. This reflects the highly restricted development potential of a Green Wedge zoning.

The subject site is in an Urban Growth Zone so on the face of it a land value of around \$1.8m per ha or more could be assumed. However, aside from the northern portion where 101 lots are proposed, the balance of the land has limited development potential due to its heritage listing (and the designation in the UDF). Its development potential is more akin to the Green Wedge Zone.

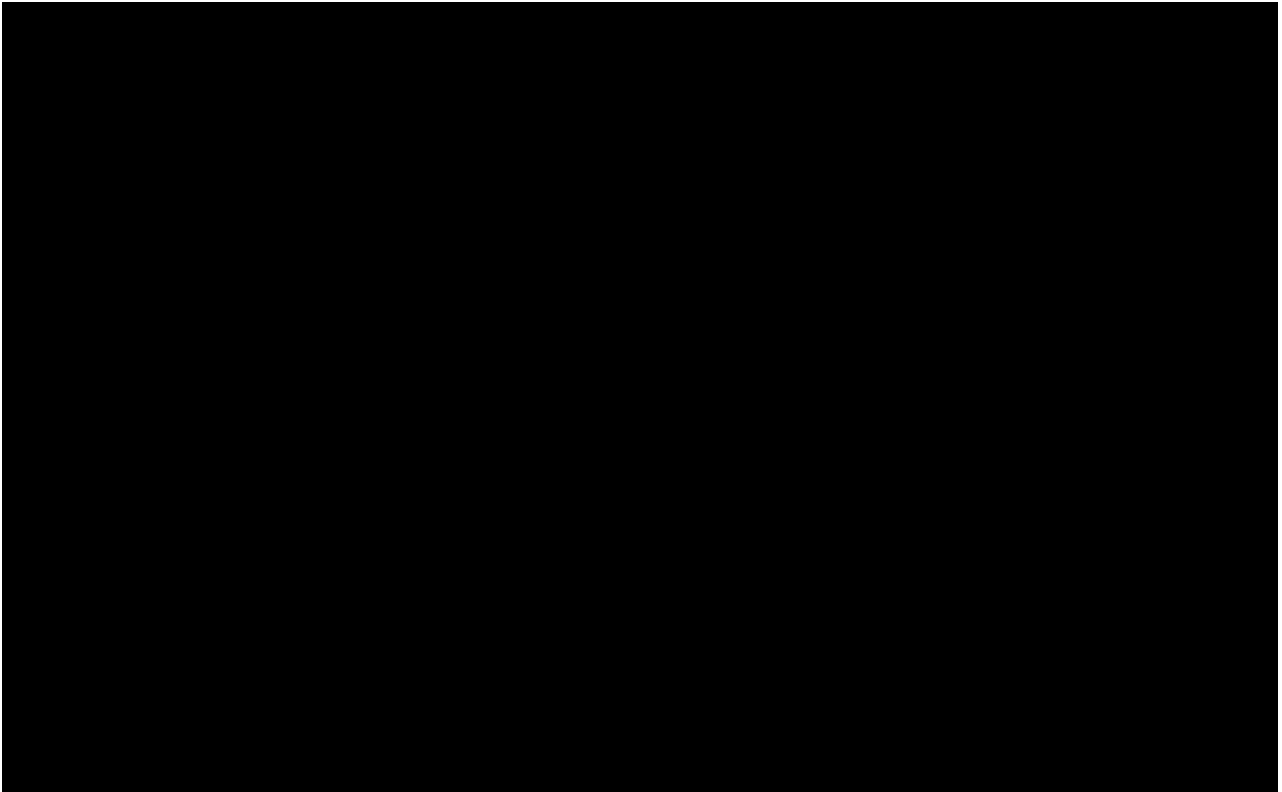
The two examples highlighted in Table 7 have values around \$1.2m to \$1.35m per ha. However, these sites offer a good standard dwelling which would have a replacement cost of around \$700,000. If this is netted out the site values become \$0.89m and \$1.18m per ha - average \$1.0m per ha.

It can be argued that both the Farm Buildings and the homestead precincts will be offered to the market with improvements benefiting from conservation works expenditure. On the other hand, these improvements will require additional expenditure to accommodate economic uses. Hence it is assumed that the land value of the sites should be based on vacant land and with development potential like a Green Wedge Zone. Hence a value of

[REDACTED]

[REDACTED]

TABLE 7 – SALES EXAMPLES

A large black rectangular redaction box covering the entire content of Table 7.

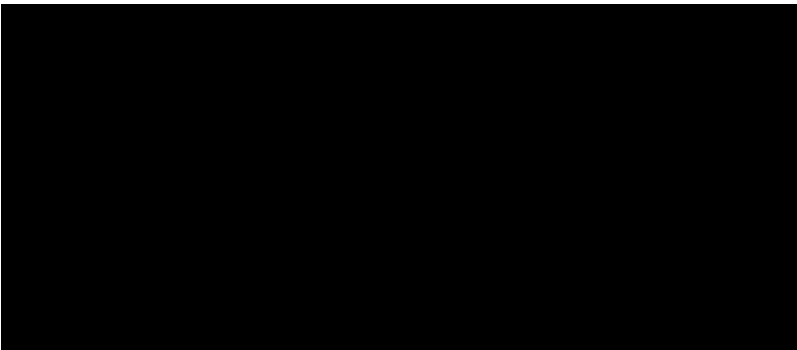
Source: Consultant Research

Note: Details of the two comparable sites are included in Attachment 2.

4.4 Results

Based on the estimates provided above the results of the terminal return calculation are shown in Table 8.

TABLE 8 – RESULT OF TERMINAL RETURN CALCULATION

A black rectangular redaction box covering the entire content of Table 8.

Source: Calculated from Above-Described Variables.

4.5 Key Assumptions and Risk

As has been pointed out above the simplifying assumption is that the distribution of costs and revenues is similar over the timeframe, that is the cost and revenue streams run in parallel. It has been assumed that the ten stages mapped out in the Project Staging (Table 1) can take place over a four-year period. If a situation arises where costs are brought forward relative to revenues, there will be implications for the profit margin as there will be additional interest costs. To avoid this threat to the viability of the project this means that the conservation works must be programmed to take place in parallel with the subdivision and release of lots.

A related issue is the prospect of bank guarantees being required. It must be noted that banks charge up to 3%pa of the guaranteed amount, which [REDACTED] for four years.

4.6 Interpretation of the Results

The calculated margin for the overall development ([REDACTED]) falls short of a target of 10% which leaves little room for downside risks that are potentially associated with possible cost overruns and/or revenue shortfalls. There is no scope for programming the conservation works in advance of lot production or for expensive bank guarantees.

Looking at the heritage buildings alone, it is shown that this component contributes little to the viability of the project. Hence it must be acknowledged that the proponent of the development is willing to proceed based on a very modest return while including the conservation works. This should be viewed as an opportunity to achieve an appropriate conservation outcome in the circumstances that are presented.

5. Reasonable Use

5.1 Meaning of 'Reasonable Use'

Heritage Victoria has published a policy on the relevant matters for the consideration of section 101(2)(b) of the *Heritage Act 2017* relating to reasonable or economic use. Regarding **reasonable use** the policy (in summary) contends:

- Reasonable use is not affected by refusal if a place can be used without the proposed changes.
- The Executive Director may consider:
 - the historic, recent and current uses of the registered place or object,
 - other compatible uses of the registered place or object,
 - the context and setting within which the place or object is located, and
 - other relevant matters.
- Refusal to enable a change of use may affect reasonable use if the historic use is obsolete.
- Refusal to upgrade facilities to meet standards may affect reasonable use.

5.2 Can the Place be Used Without the Proposed Changes?

The Melton Planning Scheme states (Clause 21.01-3):

The Shire's rural areas have traditionally been used for grazing and cropping (primarily cereal production such as wheat, barley and oats) and agriculture remains as the dominant use of the rural areas. In recent years the main rural enterprises to emerge are horse breeding and harness racing activities and there is some evidence to suggest a trend towards viticulture and more intensive agricultural uses such as poultry farming.

Regarding the existing use, the land is currently used for grazing sheep, and it is assumed that this use could continue within the Urban Growth Zone on the basis of existing use rights. Should this or a permitted rural use be pursued it is evident that potential constraints would arise as related to the proximity to residential development to the north. Should farming continue, issues likely to arise include dust emissions, noise and odours. Additionally, the land has poor soil conditions and with rainfall variability is not highly productive.

The most important aspect of any future use is that there is little, or no likelihood of a use being attracted that can generate the funds that are necessary to refurbish the heritage assets. All the uses mentioned above would proceed based on maintaining the site 'as is'. Without a source of additional funds, the deterioration of the assets potentially will accelerate.

Use of the homestead house as a dwelling or a commercial use such as hospitality, the bluestone barn for a commercial use (e.g. brewery or café) and the shearing shed for events are deemed to be appropriate and compatible with the heritage values of these buildings. However, given the cost of the required conservation works and then the works required to accommodate such uses there is little likelihood of these use being financially viable. Proceeds from the development of residential lots are required.

5.3 Matters for Consideration

The historic, recent and current uses of the registered place or object.

The historic use was for sheep grazing as part of an extensive land holding. Recent use has been 'marginal' with a small number of sheep grazed for grass control purposes. The current use is an extension of this. Other than the residential use of the homestead, no beneficial use of the buildings has been found to date and they have continued to deteriorate.

Other compatible uses of the registered place or object.

As has been proposed in the UDF, residential use has been identified as an appropriate use on the northern portion of the site. Use of the homestead house as a dwelling or a commercial use such as hospitality, the bluestone barn for a commercial use (e.g. brewery or café) and the shearing shed for events are deemed to be appropriate and compatible with the heritage values of these buildings.

It is important to note that the plan as proposed restricts the residential subdivision area to the land identified in the UDF as 'Residential Use' and does not substantially encroach on the areas designated 'Sensitive Development Area'. It is a reasonable proposition that the land should be able to be developed in accordance with the approved Urban Development Framework.

The context and setting within which the place or object is located.

As has been identified in the UDF, residential development as proposed preserves the required views to and from the heritage assets and creates an appropriate setting.

5.4 Is the Historic Use Obsolete?

The historic use of the land as part of a large-scale sheep station is obsolete. The historic uses of a number of the individual buildings are also obsolete.

5.5 Are Standards an Issue?

The expectation is that for a number of the buildings, regulatory compliance with the National Construction Code will be an important consideration. Given the significance of the structures full compliance will not be possible and performance-based outcomes will be applied. Additionally, under the provisions of the Building Act exemptions may be sought which are applicable to buildings included in the VHR.

5.6 Conclusion on Reasonable Use

On the basis that the use for residences in the northern part of the site is identified as being appropriate in the UDF, and this has been given statutory effect in the Melton Planning Scheme, this use is eminently 'reasonable'. The UDF ensures that an appropriate context and setting for the heritage assets will be achieved.

Use of the homestead house as a dwelling or commercial use such as hospitality, the bluestone barn for a commercial use (e.g. brewery or café) are deemed to be appropriate and compatible with the heritage values of these buildings and are therefore 'reasonable' uses going forward.

The likelihood of an alternative use (to the proposed residential development in the northern portion of the site) being attracted that can generate the funds to refurbish the heritage assets is remote indeed. There is therefore an urgent requirement to commence the proposed reasonable use to save these assets from oblivion.

6. Economic Use

6.1 Meaning of 'Economic Use'

Heritage Victoria has published a policy on the relevant matters for the consideration of section 101(2)(b) of the *Heritage Act 2017* relating to reasonable or economic use. Regarding **economic use** the policy (in summary) contends:

- The financial circumstances of the applicant or owner are irrelevant, but the feasibility of the proposed development may be relevant insofar as it relates to the viability of an ongoing use.
- The question of whether works will facilitate an economically sustainable use is relevant.
- An applicant may be required to provide evidence of economic impact.
- Economic use may be affected if refusal would limit capacity to cover outgoings on a property.

6.2 Financial Circumstances of the Owner

While the financial circumstances of the current owner are deemed to be irrelevant in the Heritage Victoria Policy to the Director's decision making, the situation that exists would be the same for any owner. Matters to consider include:

- Notwithstanding that under the ownership of the current owner funds have been expended on necessary urgent conservation works including structural stabilisation, repairs, tree removal and consultation, a number of the buildings and structures are in need of significant further works to sustain them into the future.
- Considerable costs have and continue to arise associated with keeping the site secure. Incidents of vandalism are frequent, as is theft of items such as security fencing and building components.
- The 'highest and best use' of the land without redevelopment is sheep grazing. This generates minimal income.

The feasibility of the proposed development insofar as it relates to the viability of an ongoing use is tested below.

To be consistent with the Heritage Victoria Policy that the financial circumstances of the applicant or owner are irrelevant the question of whether the owner should cross subsidise redevelopment of this heritage listed place from profits derived from developing other land should not be asked. The focus must be solely on the inherent economics of developing the listed place.

6.3 Will the Proposal Facilitate an Economically Sustainable Use Going Forward?

The Heritage Victoria Policy States:

21. Refusal to issue a permit for works which would enable the use of the registered place or object to generate income critical to fund ongoing and future conservation and maintenance, may affect the economic use of the registered place or object, particularly if the historic, recent or current use is a commercial use. A permit refusal may affect the economic use of a registered place or object if it would limit the capacity of an existing or compatible commercial use to generate income necessary to cover the cost of:

- *conservation and maintenance of the registered place or object; and/or*
- *rates and land tax directly associated with the registered place; and/or*
- *capital improvements to ensure the continued use of the registered place or object, where that use contributes to its significance (including reasonable debt repayment and interest costs). For example, improving infrastructure or services to ensure that an existing compatible commercial use continues to attract tenants and/or customers.*

Even a cursory inspection of the buildings on the site reveals that they are in a precarious state. Moreover, they are under threat from vandalism and materials theft, and potentially arson. As a consequence of illegal entry to

the site they pose a risk to public safety, and this is despite efforts by the current owner to address these issues – at considerable expense.

The works that are required to secure and stabilise the buildings and structures and refurbish the homestead to meet contemporary requirements for future occupation have been identified and costed at [REDACTED].

The commercial component of the development that will create the necessary capital to implement the conservation works is the creation of 101 conventional and medium density lots on the northern portion of the site (as envisaged the UDF)

The financial modelling detailed above demonstrates that an investment in the conservation works as proposed can be generated from creation of 101 lots in the northern portion of the site. This will yield a small (sub-commercial) but positive margin for the owner.

6.4 Would Refusal Limit Capacity to Cover Outgoings on a Property?

In its current state the site requires attention to several issues on an ongoing basis, including:

- Rubbish dumping and cost of clean-up and removal.
- Trespass, motorbikes, vehicles – particularly when the boat races are on the Weir
- Stock theft.
- Dumping of unwanted pets of unknown disease status.
- Fences being cut or damaged, checking fences every 2nd day compared with once a week in areas away from these problems.
- Dogs attacking stock.

Dealing with these issues is expensive and time consuming. An indication of some of the annual costs is provided in Table 4. The rate bill for the property is [REDACTED]

[REDACTED] Refusal of the permit application would see the current use, where a few score of sheep are grazing, continue. This would generate only a fraction of the income necessary to cover these costs, let alone other overheads such as maintenance, insurances and security.

What Alternatives are There?

Clearly, the current use where a few score sheep are run on the site will not cover the ongoing costs of site management and is this is financially unsustainable. The necessary capital for much needed conservation works will not be generated.

An alternative that may be considered might be to offer the homestead and farm buildings to the market for residential use. However, it is likely that the potential sales revenue from this option will fall short of the development costs. This is not a financially viable option.

An alternative commercial development that may be considered would be based on developing the buildings for commercial uses. The homestead and farm buildings could be developed as hospitality venues, such as a reception centre and/or restaurant. However, the market value of these types of development would be dictated by that of other sites in the region that do not have a requirement to do major conservation works. Hence this option would not be financially viable without a cross subsidy from the proposed residential development.

To make these alternative uses for the homestead and farm building viable, the capital that is required to do the conservation works (and bring them to a 'warm shell' state) must be derived externally. This is where the creation of 101 residential lots comes in.

6.5 Conclusion on Economic Use

To be consistent with Heritage Victoria Policy the financial circumstances of the current owner are not a consideration, hence there is no consideration of financial hardship nor external financial resources.

The registered place in its current state is not an economically sustainable situation. The current use does not generate sufficient income to cover the considerable outgoings for the site. The heritage assets have degraded over time and continuation of the current use, or any other use that does not generate funds for conservation works, will result in continuing degradation.

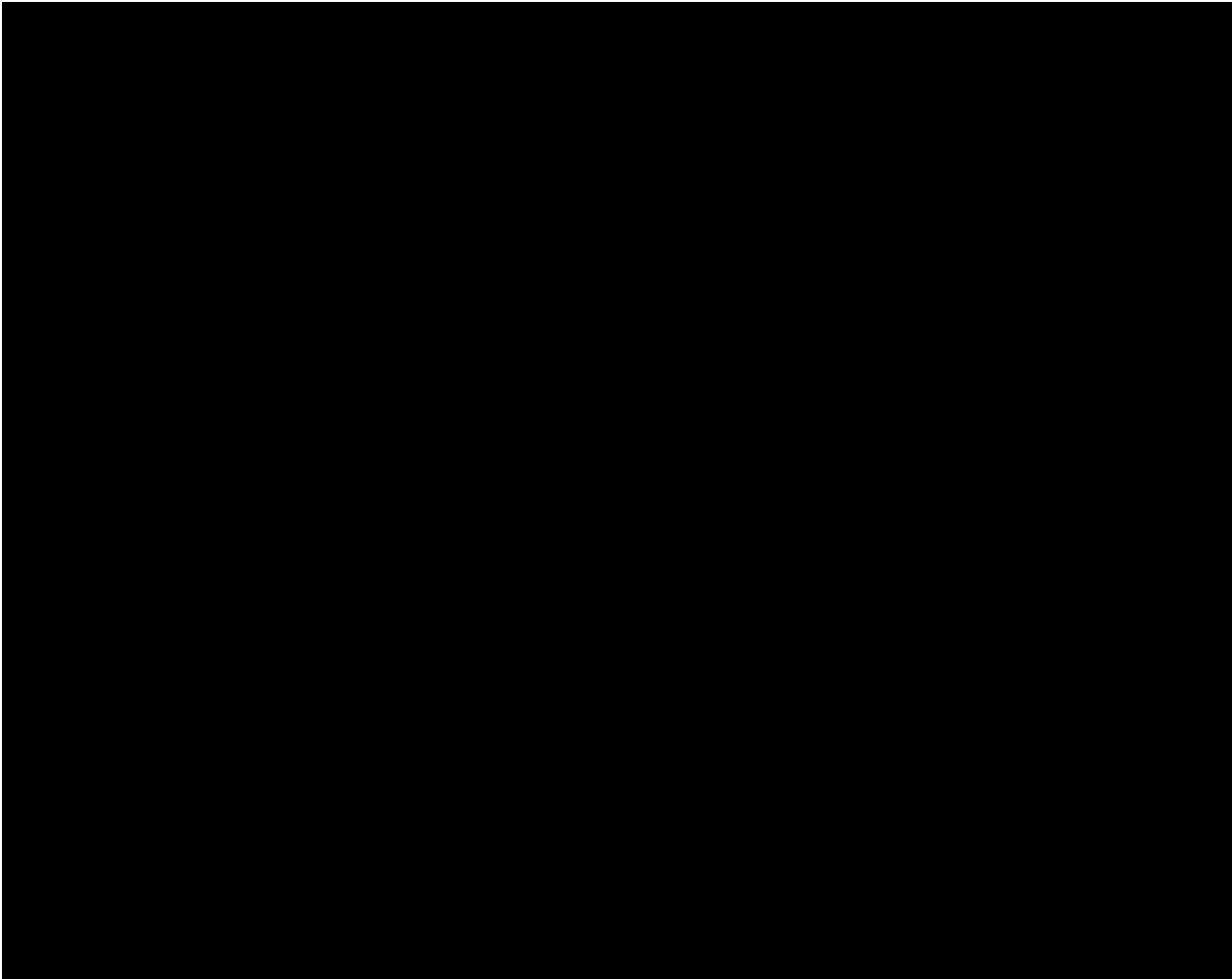
The proposal to create 101 residential lots in the northern portion of the site, in accordance with the statutorily approved Urban Design Framework, creates a potential to generate the necessary funds for urgently needed conservation works. The project is on the margin of financial viability, but it presents a unique opportunity to achieve an appropriate conservation outcome.

The calculated margin for the overall development (██████) falls short of a target of 10% which leaves little room for downside risks that are potentially associated with possible cost overruns and/or revenue shortfalls. There is no scope for programming the conservation works in advance of lot production or for expensive bank guarantees.

References

- Heritage Act 2017 No 7 of 2017Gap A
- Heritage Victoria Policy on Reasonable or Economic Use (June 2021).
- Incorporated Document Melton Planning Scheme, 2022, Urban Design Framework.
- Lovell Chen, 2020, Exford Homestead Conservation Management Plan.
- Lovell Chen, April 2025, Draft Heritage Impact Statement.
- Marshal, 2025, Exford Waters Development Cost Estimate.
- Marshal, 2025, Exford Waters Development Plan.
- Melbourne Quantity Surveyors, 2025, Heritage Works Cost Estimate.
- RPM, 2025, Estimate of lot Sales Prices.
- Shire of Melton Planning Scheme.
- Shire of Melton, 2022, Exford Waters Design Guidelines.
- Wegg Pty Ltd, 2025, Information on land value, site outgoings and developer overheads.

Attachment 1 – Sales Revenue Estimate



Attachment 2 – Comparable Sites Details



95-97 Strathtulloh Circuit, Strathtulloh, Vic 3338

<https://www.realestate.com.au/property-acreage+semi-rural-vic-strathtulloh-146733292>

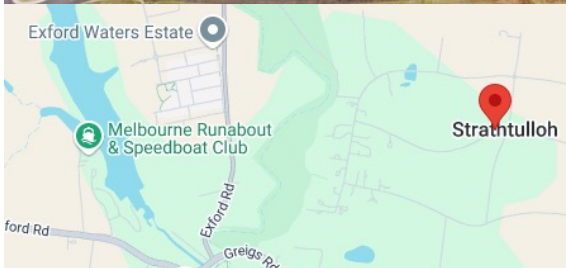
8 BR

4.05ha

Indicative price: \$5,500,000 - \$5,700,000

Say \$5.5m

\$1.3m per ha



42-44 Greens Road
Strathtulloh, VIC 3338

5BR

2.02 ha

\$2,400,000 - \$2,600,000

\$1.2m per ha

Attachment 3 - Summary CV

Rodger Gibbins, Urban Economist and Planner

Qualifications

- Graduate Diploma Economics (La Trobe University)
- Master of Urban Planning (University of Melbourne)
- Diploma of Applied Science (Town Planning) (R.M.I.T.)

Expertise

- Cost-Benefit Analysis
- Business Case Preparation
- Economic and Social Impact Analysis
- Economic Development Strategies
- Investment Attraction Strategies
- Tourism Strategies
- Land Administration Policy
- Housing Policy and Program Evaluation
- Urban Systems Modelling
- Retail Needs Analysis
- Industrial Land Use Strategies
- Employment Forecasting
- Workforce Planning Strategies
- Public Policy Advisory

Selected Relevant Project Experience on 'Reasonable or Economic Use'

- **Australia-wide <Melbourne Pty Ltd:** A report to Heritage Victoria on a proposal to refurbish an historic former Rechabite Hall in Little Chapel Street Prahran. The proposal involved removing extensive 1980's additions and replacing with new office floor space compliant with modern standards.
- **Mecca (2024):** Commissioned to prepare an independent report to Heritage Victoria as a follow-up to the 2022 report. The report relates to a proposed 'MECAversity' (a beauty and wellness education facility) on Level 1 within the heritage listed former David Jones store located at 299-307 Bourke Street, Melbourne. The space was allocated to 'back of house' in a previous HV permit.
- **Rodd & Gunn (2023):** Commissioned by Rodd & Gunn Australia Pty Ltd to prepare a report to Heritage Victoria on issues relating to 'reasonable or economic use' arising from Section 101 of the Heritage Act 2017. The report relates to a proposed integrated high-end retail and hospitality tenancy concept within the heritage listed former David Jones store located at 299-307 Bourke Street, Melbourne.
- **Shatter Pty Ltd (2023):** A report to HV on a proposal is for the Athenaeum Theatre in Sorrento to be adaptively reused as retail premises. The proposed works are mostly confined to the interior with the greatest extent of change occurring in the already altered foyer.
- **Castlemaine State Festival Ltd (2023 – on hold due to funding withdrawal):** A report to HV on a redevelopment proposal for the Castlemaine Goods Shed. The vision is "to be a leading cultural festival and arts centre in

regional Australia, engaging people in vibrant experiences, in new and unexpected ways.” The vision for the Castlemaine Goods Shed is to create a vibrant creative precinct that is home to the festival, supports and inspires creative practice and partnerships, engages the community and

- **Mecca (2022):** An independent report to Heritage Victoria on issues relating to ‘reasonable or economic use’ arising from Section 101 of the Heritage Act 2017. The report relates to a proposed retail tenancy concept within the heritage listed former David Jones store located at 299-307 Bourke Street, Melbourne.
- **Burnham Beeches Investments Pty Ltd:** The report to HV relates to the proposed Burnham Beeches redevelopment project. Located 35 km east of Melbourne’ CBD the subject site sits in a bushland setting featuring the iconic three-storey mansion built by the Nicholas family in 1930-33 designed in the Art Deco Streamline Moderne style. The land was initially a mountain retreat and working farm but only for a few years until WW2 when it became a children’s hospital.
- **Melbourne Racing Club (2022):** SC Lennon & Associates was commissioned to prepare an independent report to the Heritage Council of Victoria on the ‘reasonable and economic use’ of a development proposal for the Caulfield Racecourse. The report dealt in part with the implications of listing the site on the VHR after development had commenced in compliance with a planning permit.
- **Richmond Football Club (2021):** SC Lennon & Associates was commissioned to prepare an independent report to the Heritage Council of Victoria on the ‘reasonable and economic use’ of a development proposal for the Punt Road Oval. The proposal is to continue the use as an AFL venue with substantial modifications to bring the venue up to standard and to cater for the needs of the primary user - the Richmond Football Club. The work involved supporting a case that the project was a continuation of the process of adaption to accommodate the evolution of the game.
- **Community Venues (2021):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal to refurbish the heritage listed Festival Hall Building. The proposal is to continue the use as an entertainment venue with substantial modifications to bring the building up to standard and to cater for the needs of the primary user - the Hillsong Church. The work involved financial modelling of options depicting various levels of development intensity.
- **ISPT Pty Ltd (2020):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal to refurbish the heritage listed former Land Titles Office building to accommodate the world class Benaki Museum. The proposal was to build a 30 level tower over the strong rooms to bring the development onto a commercial basis, given the costs involved in the heritage works. This assignment involved a cost benefit analysis of the museum component where the main benefits are derived from the cultural and educational benefits of the museum and conservation of the heritage asset. An economic impact analysis was also provided including the employment uplift associated with increased tourism numbers.
- **Saint Columbans Mission (2019):** Rodger Gibbins was commissioned to prepare a report to Heritage Victoria on issues relating to ‘reasonable or economic use’ arising from Section 101 of the Heritage Act relating to a proposal to redevelop a site located at 45 to 69 Woodland Street Essendon. This report also addresses the 2012 ‘Heritage Guidelines’ issued by Heritage Victoria and the Heritage Council of Victoria (still relevant to the current Act).
- **PDG Corporation (2018):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal for the Toyota Dealership site in Elizabeth Street Melbourne. The proposal was to demolish part of a registered building to accommodate multi-level commercial floorspace. The report addressed

issues relating to the 'reasonable or economic use of the registered place' and is based on financial modelling of development scenarios.

- **RJ International (2017):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal ('Tea House' located in Clarendon Street South Melbourne) involving construction of a hotel adjacent to a registered building. The report addressed issues relating to the 'reasonable or economic use of the registered place' and is based on financial modelling of development scenarios.
- **Caydon Property Group (2016):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal (Malt Precinct in Cremorne – Silos and Nylex Sign) involving the potential demolition of registered buildings (pursuant to Section 73(1)(b) of the Heritage Act 1995). The report addressed issues relating to the 'reasonable or economic use of the registered place' and is based on financial modelling of development scenarios.
- **Victoria University (2015):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal (Maidstone former migrant hostel and munitions plant) involving the potential demolition of registered buildings (pursuant to Section 73(1)(b) of the Heritage Act 1995). The report addressed issues relating to the 'reasonable or economic use of the registered place' and is based on financial modelling of development scenarios.
- **Private Client (2015):** In the capacity of Consultant Director at Urbis: Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal (Wesley Church Site in Lonsdale Street) involving the partial demolition of a registered building – the Princess Mary Club (pursuant to Section 73(1)(b) of the Heritage Act 1995). The report addressed issues relating to the 'reasonable or economic use of the registered place' and is based on financial modelling of development scenarios.
- **Lend Lease (2014):** Preparation of an independent report to the Heritage Council of Victoria on the economics of a development proposal (East Melbourne Synagogue site) involving the partial demolition of a registered building (pursuant to Section 73(1)(b) of the Heritage Act 1995). The report addressed issues relating to the 'reasonable or economic use of the registered place' and is based on financial modelling of development scenarios.