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Mr Tim Smith
Executive Director
Heritage Victoria
PO BOX 500
MELBOURNE VIC 3001

File no.: B7204

Dear Mr Smith,

RE: Permit Application P25033 – Richmond Maltings (VHR2050)

The National Trust of Australia (Victoria) submission responds to the above permit application which seeks the ‘retention and adaption of existing buildings; demolition and partial demolition of existing buildings, construction of new buildings and associated multi-level basement carpark, and landscape’ across the Richmond Maltings site (VHR2050).

Whilst the National Trust is generally supportive of Caydon Cremorne Developments Pty Ltd.’s proposal to adaptively re-use the site, we have a series of major concerns relating specifically to the large-scale demolition of registered (and some currently permit-exempt) buildings across the site.

Whilst the existence of permit exemptions and ‘secondary significance’ gradings in the 2005 *Conservation Management Plan* have been raised as the justification for demolition, the National Trust fundamentally objects, consistent with its position on the registration matter currently being dealt with separately by the Heritage Council, to the existence of the permit exemptions allowing demolition of buildings and structures identified as being significant.

The proposed widespread demolition of significant elements is justified as a means of achieving ‘a balance on the site which enables a level of development to occur which can in turn support the conservation of the remaining retained significant buildings’ (Lovell Chen *Heritage Impact Statement*, July 2016, p.40).

Demolition of significant structures relying on a permit exemption cannot be claimed to be offset by conservation works to a handful of retained structures. There is no assessment policy that indicates such a trade-off can be contemplated. Demolition must be assessed against impacts on significance, and economic considerations may apply. The Lovell Chen *Heritage Impact Statement* July 2016 (LCHIS) acknowledges that some of the proposed works, notably demolition of B11 (1939-40 Barley Store) will represent a 'heritage loss'.

The proposed demolition of the B9 structure, the 1960s silos, will have a severe impact on the significance of the site. We are generally supportive of the proposed changes to B8, which demonstrates that concrete silos can be sympathetically adapted to apartment living. This should be used as a model to retain B9.

The Trust considers the new development a massive overdevelopment of the site. Essentially, 3½ heritage buildings will be retained at the centre of the site (B4, B5, B8, partial B6 for Stage Two), and the rest are proposed for complete demolition (B7, B9, B10, B11, partial B6 for Stage Two and B1, B2, B3 in Stage One).

National Trust Statement of Significance

As outlined in the National Trust Classification Report, 'the whole of the malting works (and remnants of a former brewery) in the area bounded by Hoddle Street, Gough Street, Cremorne Street and Harcourt Street, with the exception of Buildings shown as B10 and B11 (H5 and G5 in the Conservation Management Plan)', are classified by the National Trust (B7204). As documented in the National Trust Statement of Significance:

'It is historically significant as one of the few surviving malthouses in Victoria, the historical centre of Australia's malting industry. It is believed to be the oldest, largest and most intact purpose-built malt houses in Victoria. It is the only known maltings in Victoria with three traditional styled malthouses.'

'It is technically significant for its ability to demonstrate the changes in malting technology from the late nineteenth century.'

'It is socially significant as a vernacular landmark in the city for more than one hundred years'

'It is aesthetically and architecturally significant for the distinctive architectural forms of the nineteenth and twentieth century buildings, including the pyramidal rooflines with elevator turrets and clerestory lighting. Malthouse architecture is regarded as one of the best expressions of industrial revolution functional architecture, and this is the only known complex in Victoria which retains multiple malthouses all with their characteristic roof-forms intact. This visual impact is enhanced by the remarkable compactness and prominence of the complex.'

VHR Statement of Significance

The Victorian Heritage Register statement of significance emphasises the historical significance of the site as 'one of the few surviving malthouses in Victoria,' and as one of 'the oldest, largest and most intact purpose-built malt houses in Victoria.' The site is considered 'remarkable' for the fact that it has been in 'continuous operation' in connection with the brewing industry for over 140 years.

Similarly, the site is technically significant 'for its ability to demonstrate the changes in malting technology from the late nineteenth century'. The statement of significance continuously emphasises how the site has

‘operated in three centuries’, with the twentieth century additions demonstrating ‘some of the sweeping changes to the malting industry in the early mid-twentieth century’.

With regard to the 1960s silos, the statement of significance states:

‘The buildings include the two large mid-1960s concrete silos, which together comprise the largest maltings silos in Victoria, and are one of the largest examples of the concrete silos that are strongly associated with Victoria’s farming areas and the food processing industries of urban areas. Modern silos are mostly smaller scale steel structures, so these large concrete buildings represent a now-redundant form of silo construction. They also represent the development of bulk handling of grain that began to replace bag handling from the c.1940s, and that was officially instituted by the grain Elevators Board for barley in the mid-1960s.’

The statement of significance also recognises the social significance of the place. The site is *‘socially significant as a vernacular landmark in the city for more than one hundred years’*. The statement identifies the 1960s silos as contributing to this significance, noting their central location for travellers on the South-Eastern Freeway and Punt Road as a *‘gateway to Melbourne’*. The statement quite succinctly (and prophetically) sums up the importance of this social significance for Victorians, noting that the possible demolition of the silos *‘has generated an unusual amount of media and public opposition’*. The statement of significance was first drafted in 2003, and more than a decade later this observation remains valid.

Scope of Works

The National Trust is generally supportive of an adaptive-use of the site that allows the collection of buildings to become re-activated but retains the all or most of the significant structures. As noted in the permit policy, ‘there exists scope for works, alterations and adoption to any given feature without diminishing the overall significance of the place’. The National Trust questions the definition of this ‘scope’ and how far this can be interpreted by the developer to undertake demolition works.

B4 (Late 1930s malt house) and B5 (1880 and later malt house): ‘Slicing’

The Trust strongly objects to the proposal to slice through back of these two buildings (which have both been identified as having primary significance to the site) – and extent of interior demolition for B5.

LC HIS comment, p.18:

‘A slice or slice through’ is proposed for the southern part of B4, of 2.27 metres width. This involves the removal of internal and external fabric, including roof, effectively creating a uniform opening in the building from its east and to west side, and from the ground level to the top of the building. The opening will connect with an access or through way to the east, proposed as part of Stage 1 development. It will also connect with a similar and aligned ‘slice’ proposed for B5.’

LC HIS comment, p.19:

‘Regarding the proposed ‘slice’ through the building, it is acknowledged that this is an **unorthodox approach** to intervention into a heritage building.’

LC HIS comment, pp.23-24:

‘As per B4, a ‘slice’ or ‘slice through’ is proposed for the southern part of B5, of 3.07 metres width, which will largely separate the 1880 and 1930s components of the building. This involves removal of internal and external fabric, including roof, effectively creating a uniform opening in the building from its east to west side, and from ground level through to the top of the building. The opening, although larger, will connect with the similar and aligned ‘slice’ proposed for B4’.

LC HIS comment (referring to B5), p.25:

‘Regarding the 1930s addition, the proposal to cut away most of the ground level fabric of the building and to open it up by a way of cantilever, is also a **dramatic approach**. It differs from the more conventional approach to openings as proposed for the remainder of B5 and also B4. As an element of secondary significance, however, this building component provides greater flexibility for the extent of change proposed.’

Extensive Internal Demolition of B5 (1880 and later malt house)

Significant demolition of internal features are proposed for B5. This building has primary importance within the site, and no exemptions to remove internal elements apply.

2005 *Conservation Management Plan*, points relating to B5:

- ‘It is recognised that in seeking to accommodate a new use, there will be some loss of significant fabric and plant, although the objection should be to **minimise any loss**’
- ‘Extraneous piping, minor equipment, electrical conduits, etc can be removed, **although too much ‘tidying up’ should be avoided**, to ensure the industrial character of the building is retained.’

LC HIS comment, p.24:

‘it is recognised that internal adaption of this building is difficult, due to the presence of significance internal fabric and remnant equipment and machinery. **As with B4, the approach to adaptation is to balance the extent of removal and retention of fabric.**’

B6 1920 malt house – substantial demolition of building

The major part of this building is proposed to be demolished. The proposed works to this building are not supported and should be substantially modified to retain more of the registered place (exterior and interior).

LC HIS Proposal for B6, pp.29-30:

‘a combination of demolition and retention is proposed for this building, including demolition of the majority of the west portion of the building, including roof and external walls save for the south elevation; and retention of the east portion’

LC HIS comment, p.30:

‘The proposal for B6 represents a **substantial change and intervention** into the building. **Effectively, a large area of the building is proposed for demolition**’.

LC HIS comment, p.31:

‘It is also recognised that the proposal for B6 differs substantially from B4 and B5 in terms of the extent of building form and fabric being retained, and the degree of intervention with a new building. For B6, greater intervention is identified, including more intensive new development and building height. Within a site of this nature, with a complex developmental history, a core of significant buildings in varying stages of intactness, and a development strategy which combines retention, conservation, demolition and new buildings, **B6 has been flagged as a building which can withstand the proposed degree of change. This is not to suggest that the building is to be ‘sacrificed’.**

The proposal is at odds with the 2005 *Conservation Management Plan* regarding B6:

- ‘The south elevation of the 1920 building component is largely intact, is a very visible component of the site, **and should be retained in its current form.**’
- ‘**Internally, the ground floor space is a significant aspect of the building, and if adaptation is proposed, a substantial proportion of open space and existing fabric and form of this level should be retained.**’
- ‘In the event of nearby development on the site, **the Malthouse should not be overwhelmed by any new building.**’

B8 1952 concrete silos and B9 1960-62 concrete silos: adaption versus demolition

The Trust is generally supportive of the proposed changes to this site. The proposal demonstrates that concrete silos can be sympathetically adapted to apartment living. This should be used as a model to retain B9.

LC HIS Proposal for B8:

Demolition of some elements, including internal work, essentially retaining the silos in a modified form, with ‘Removal of sections of some of the concrete cylinder walls to accommodate adaption, where these sections are associated with the served apartment use, and introduction of new openings/windows.’

LC HIS Comment (p.37):

‘The proposal for B8 is to substantially retain the silos and grain-elevator tower, and to adapt the building to serviced apartment use. As silos, adaption presents particular challenges, and these are addressed here through building around part of the exterior of B8 and connecting and integrating the new spaces into the silos via new openings... **Overall, the proposal for B8 will maintain the industrial aesthetic qualities of the building which make an important contribution to the Gough Street streetscape, where the silos are seen as a prominent element of the site... Internally, the adaption works will minimally impact on significant fabric.**’

It is strongly preferred that B9 be retained in a similar way to B8. The Trust supports the adaptive re-use of B8, and commends the developer for finding a unique way to retain the building onsite in a sympathetic manner without having to undertake wholesale demolition.

The proposal to demolish the B9 1960-62 concrete silos is opposed. They have high landmark qualities and represent an icon element of the site.

LC HIS Proposal for B9 Concrete Silos (p.40):

'It is proposed to demolish this building and associated plant.'

The LC HIS under-values B9 to justify demolition:

'As a building type, the silos are one of a number of broadly similar concrete storage silos erected by sale maltsters in Victoria in the 1960s and later. The form and fabric of the silos are therefore largely representative and of a standard nature. While the demolition will remove a building which is well known and prominent, it will not remove a building of great rarity or architectural or technological distinction.' (p.40)

The LC HIS justification for the removal of B9:

'The demolition of B9 is also, as with B11 (see below), proposed as a means of achieving a balance on the site, which enables a level of development to occur which can in turn support the conservation of the significant heritage buildings. This part of the site, as proposed for intensive development, is also outside and away from the core of retained heritage buildings on the centre of the site. It provides an opportunity for a substantial new building, in a location where the existing building is identified for demolition.' (p.40)

The 2005 *Conservation Management Plan* comments on potential future plans for B9:

'With regard to the landmark qualities, the scale and height of the structure is important. Future management of the silos should seek to retain aspects of their landmark values. **This could be achieved through retention of a reduced number of vertical cylinders.**'

B11 1939-40 barley store

The Trust does not support the proposed demolition. The demolition is identified by Lovell Chen as a 'heritage loss'. The 2005 CMP identified this building as being of **primary significance**, of historical, architectural and technological significance.

LC HIS Proposal for B11:

'it is proposed to demolish this building'.

LC HIS comment, p.45:

'The demolition of B11 **will represent a heritage loss**. Historically, its construction reflected the requirement for Australian maltsters to provide additional grain storage on their sites near the outbreak of WWII; and technologically, the building pre-dates the bulk handling era of barley storage on a sales maltster site.

LC response to CMP notes, p.62:

'As with the proposed B6 works, the demolition of this building is part of a comprehensive suite of works across the site which seeks a balanced overall outcome... **The demolition of this building can reasonably be balanced against the retention of B4 and B5, and part of retention of B6.**

LC HIS Comment, p.45:

‘The demolition of B11 is also, as with B9, proposed as a mean of achieving a balance on the site, which enables a level of development to occur which can in turn support the conservation of the remaining retained significant buildings. This part of the site is also outside and away from the core of retained buildings in the centre of the site, and in combination with B9 provides an opportunity for a substantial new building. While that in itself is not necessarily justification for demolition of this particular building, in the context of the balanced actions and outcomes proposed for the whole site, it can be regarded as an acceptable outcome’.

New Buildings

The Trust considers this a massive overdevelopment of the site. Essentially, 3½ heritage buildings will be retained at the centre of the site (B4, B5, B8, partial B6 for Stage Two), and the rest are proposed for complete demolition (B7, B9, B10, B11, partial B6 for Stage Two and B1, B2, B3 in Stage One).

LC HIS Comment, p.53:

‘The new buildings will occupy the western part of the Richmond Maltings, and in being constructed on the site of existing buildings proposed for demolition, will transform the character of this part of the site, including the appearance of Richmond Maltings when viewed from the north, south and west.

LC HIS comment, p.54:

‘The new southern apartment tower in particular will be a conspicuously striking building in a highly prominent location. It adopts the general orientation and alignment of the existing silos, and with the vertical concave bayed expression and the Nylex sign atop, will inevitably draw comparisons with the silos building. It is however a fitting replacement for the silos, and for this prominent location, and can be regarded as a major identifier of the contemporary change proposed for the maltings site.

LC HIS Comment, p.54:

‘the proposed southern apartment tower will represent a further evolution in building form and scale on the site, in a place where building scale has not be static or consistent... Accepting all of the above, the proposal to introduce new and large buildings to the maltings site can be supported in heritage terms, as an action that will not pact on the heritage values of the place.

Comprehensive Interpretation Plan

It is noted in the HIS that a ‘comprehensive interpretation plan will be prepared, to be integrated with the Stage 2 works.’

The interpretation of this site is a key strategy for mitigating heritage impacts, however an interpretation strategy is not included in this proposal. The development of an interpretation strategy and implementation plan should be required as part of any permit conditions. As well as enhancing the historical significance of

the place, undertaking interpretation at the site has the potential to positively engage the community in the redevelopment process.

Interpretation planning for the site should be done in accordance with the Australia ICOMOS Interpretation Practice Note (2013).

If you require any further information in relation to this submission please contact Caitlin Mitropoulos on 9656 9837.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Paul Roser', with a small flourish at the end.

Paul Roser

Senior Manager

National Trust of Australia (Victoria)