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File no.: B7204

Dear Mr Smith,

RE: Permit Application P25038 & P26027 – Richmond Maltings (VHR2050) & Nylex Sign (VHR2049)

Thank you for the opportunity to provide comment on the latest proposal for the Richmond Maltings Complex and Nylex Sign. Our submission responds to the above dual permit applications which seek to redevelop the entirety of the Complex in two stages, including the following works:

...demolition of the 1928 and 1903 Malt House walls, the 1952 Drum Malt House, the 1956 and later Malt House and the 1939-40 Barley Store buildings.

Partial demolition, alterations, additions and conservation works to the 1922 Office Building, the 1930, 1880 and 1920 Malt Houses and the 1952 and 1960 Concrete Silos.

New construction including towers of 12 and 15 storeys on a 3 level podium, a tiered tower of 8-15 storeys, and a central tower stepping up from 9 to 14 storeys, with associated services and landscaping, and the restored Nylex Sign to be repositioned on the extended silos.

While we are supportive of Caydon's proposal to adaptively reuse and reactivate the Richmond Maltings complex, we still have a series of concerns relating specifically to the amount of demolition proposed for B6 (a building identified as having primary significance), the proposed height limits of the two new towers to be located to the west and south of the site (Stage 2) and the addition to the top of the retained B9 silos and the lifting of the Nylex sign.

The National Trust notes that a design response and mitigation is a key focus of the Lovell Chen Heritage Impact Statement (LC HIS) prepared for Caydon Cremorne Development Pty Ltd (Caydon). Particular mitigation outcomes proposed for the site include extensive conservation works, 'active interpretation', landscaping, archaeological investigation and recording. We would like to commend Caydon for ensuring that this is a key priority in achieving 'balance' between the existing heritage fabric and new work proposed for the site. As outlined later in our submission, the importance of these outcomes for the site as a whole and in regards to each individual building should not be underestimated, and should be firmly embedded in the permit conditions for any granted heritage permit application. It is important that these outcomes, especially in regards to interpretation across the entire site, are not simply an afterthought, but an essential design outcome in achieving the best possible development for the site.

We would also like to note that quite a significant compromise (in terms of economic ‘viability’ on behalf of the owners) has been offered as part of these amended plans, including the greater retention of B3 and B9. While the demolition of B1, B2, B10 and B11 and the moderate to high removal of fabric proposed for B6 and B9 will represent a considerable heritage loss, Caydon should be commended for amending their plans to retain more original fabric than initially advertised.

The National Trust in particular strongly supports the proposal to retain 9 of the 16 concrete silos for B9. While we would prefer that the silos were retained in their entirety, we submit that this compromise is generally acceptable, especially on the basis that the retained drums will be conserved in their current state and converted into an interpretation space that is open and accessible to the general public. The combined heritage outcomes for the retained B4, B5 and B8, and the additional proposed retention of B9, can be considered an overall positive outcome for the site that reflects a conscious effort to balance existing fabric with new development. As noted in the LC HIS, ‘finding a reuse which balances the competing demands of conservation and viability is always challenging, and it is no more challenging than on this site’ (p18). The National Trust submits that Caydon has actively attempted to mediate these concerns in a generally acceptable approach.

As noted in the LC HIS, ‘the proposal for the redevelopment of the former Richmond Maltings site contemplates a significant change in the physical form and presentation of the place.’ It can be agreed that the changes proposed for the site will not be reversible, and that they will effectively re-conceptualise the heritage place in its entirety. This re-conceptualisation can be understood in the sense that the Statement of Significance will need to be re-written if the works are permitted (for example.) As such, in response to the dual permit applications, in our submission we have attempted to respond to the plan in its entirety, while also commenting on the specific heritage impacts and concerns relating to each individual building. It is important that the plans for the site are as robust and sympathetic as possible before the permit is granted, and as such we have attempted to provide constructive feedback to achieve the best design outcomes for the site.

Overall, the dual permit applications seem more resolved and more responsive to the various concerns that have been voiced in opposition over the past few years. Caydon should be commended for their efforts in this regard.

1. Stage One proposed works

1.1. Buildings B1 and B2

The National Trust submits that the loss of these walls, while regrettable, is generally acceptable subject to their full recording. We submit the following:

- The walls and the associated (yet now demolished) buildings that once stood on the site should be included in the overarching interpretation plan for the site.
- An archaeological investigation in this portion of the site should be embedded in the permit conditions.
- Any items found during these investigations should be incorporated into interpretation works proposed for the site.
- Any sensitive Aboriginal cultural heritage material (if uncovered) should be referred to Aboriginal Victoria.

In addition:

As noted in the LC HIS (p20): ‘the works in this area also involve the removal of the car park and other sundry structures, including steel bulk loading silos located in the southern boundary of the site. These structures have not been identified as of significance’.

While these elements have not been identified as being significant, we submit that the entire site as it stands today should be subject to full photographic recording.

1.2. B3 (1920s office building)

The retention of B3 beyond the façade is a positive outcome for this building. The National Trust strongly supports the proposal to recognise the former office and laboratory function in the site interpretation. We submit some level of concern that no internal works or adaptation has been proposed for this building. A much more positive outcome for this building (in regard to the conservation versus economic viability balance), would be a clearly defined suitable future use. In respecting the historical use of this building, the continued use as an office is recommended, yet this building could also be an appropriate space to facilitate increased communal space and engagement within the site. This could be in the form of an art gallery or performance space for example. An archaeological investigation should be considered for the rear of this building where fabric is proposed to be removed. Full photographic recording of this section is also important and should be embedded in the permit conditions.

1.3. Building 4 (1930s malt house)

The retention of this building is a positive outcome for the site. The proposal to adapt the building for ‘interpretation, office and retail use’ is generally supported. The retention of the existing ‘Smith Mitchell’ sign is also a positive outcome. Rather than removing the ‘steel vehicle roller doors on the west side of the elevation’, retention of the doors in a locked position should be considered. The proposed conservation and retention of original fabric and equipment (including the timber hoppers at the first floor and the conveyor on the second floor), is a positive outcome for this section of the site.

An archaeological investigation around this building should be undertaken, especially in areas where fabric has been flagged for removal and where hard landscaping is proposed. An interpretation plan for this building should be prepared as a condition of any permit. If interpretation is proposed for this building, it should be publically accessible in at least a limited capacity. The proposed use and tenant selection will be an important consideration in mediating this concern moving forward.

1.4 Slice through B4 and B5

In our original submission for P25033, the National Trust was strongly opposed to the slice through the back of both B4 and B5. While we would prefer as much original fabric to be retained as possible, the design response and mitigation outlined in the LC HIS provides sufficient detail and justification for why this is necessary, and how it can provide a positive outcome in terms of interpretation across the site. A key benefit outlined includes the following, the slice will provide:

...dramatic views into the display zone and building interior and, through extending from the bottom to the top of the building, will reveal aspects of the buildings internal workings and complexity that are otherwise not easily understood or appreciated. Views available from the ‘slice’ will reveal a display zone/display workshop, with timber hopper and timber barley stores.

As discussed specifically in regards to B4, it is an important consideration that this section of the site is accessible to the public. If not, the benefits are not as compelling. Overall, the impacts and benefits of this proposal are more resolved in this application. The ability to highlight interpretation in this section of the site is an important outcome and an appropriate mitigation response.

1.5 B5 1880 and later malt house

The removal of the 1918/19 single storey north addition is not supported. The plan for this section of the building should be reconsidered at a design level to increase the amount of heritage fabric to be retained. Relating specifically to the following statement in the LC HIS (p40): ‘a substantial part of its wall to Gough Street will be retained, to provide evidence of the evolved form of B5’. As evident with the treatment of B1 and B2, this method does not ensure the future preservation of a building’s original fabric, and arguably undermines the significance through the process of facadism. Increased fabric beyond the walls in their isolation should be explored and considered.

Similarly, the proposal to ‘cut away most of the ground floor fabric of the building and to open it up by way of cantilever’ is not supported (LC HIS, p41). As specified above, to provide balance across the site, as much original fabric of the retained heritage buildings should be conserved. B5 is a building of primary significance, and the conservation of this building has been heralded as mitigating major demolition and new development across the site. As such, this fabric should be maintained as much as possible.

As an additional positive outcome, it should be explored whether the original kiln roof form could be rebuilt in part. This would increase the heritage benefits across the site as a whole, further balancing the proposed compromise. It would be a visually compelling addition that would also increase the industrial aesthetic of the site.

1.6 New buildings

We do not wish to comment in detail on the specific form of the new towers proposed for Stage 1, however in general terms, lesser building heights will always be supported, and increased space between the new buildings and the existing build fabric is preferred.

2 Stage 2 proposed works

2.1 B6 1920 malt house

As outlined in the LC HIS (45):

The proposed works to B6 involve the construction of an apartment tower set within and above the existing structure. The retained and reconstructed ground and first floor of the buildings are likely to be adapted for part commercial use with an emphasis on the interpretation of the original floor malting’s.

These works include the dismantling of the centre of the building and the removal of internal fabric (‘including the central section of the north wall’).

The National Trust submits that this is not a positive outcome for a building that has been clearly defined as having primary significance in the 2005 Conservation Management Plan (CMP). The CMP specifically notes that following:

Internally, the ground floor space is a significant aspect of the building, and if adaption is proposed, a substantial portion of the open space and existing fabric and form of this level should be retained.

In addition, the CMP notes the following:

A building on top of this malt house is not considered appropriate as this would obscure its form and industrial aesthetic qualities, particularly the important presentation to Harcourt Parade.

As specified in the CMP, we submit that as much internal fabric and form should be retained for this building. Overall, the proposal for B6 represents a substantial change and intervention into the building without comparable mitigation consideration.

The LC HIS notes the following (48):

Internally the expectation is that the east and west ends of the building will be retained and adapted for new commercial use, albeit with a focus on retention of the original fabric to assist with interpretation.

The loss of the majority of internal fabric and the addition of the new tower cantilevered above does not represent a positive heritage outcome. If the plans for B6 are accepted without amendment, the inclusion of active interpretation in this building should be explored alongside the retention of original fabric. If the integrity of B6 is to be sacrificed as a trade-off, there need to be appropriate mitigation outcomes, such as interpretation, reconstruction after new building works are completed, and a robust schedule of conservation works for the retained fabric.

The design of the new tower itself could also be mediated at a design level, in regard to the connection with B6 and the impact it will have on the landmark qualities of B9. This could include increased setbacks, rounded off edges, more progression between height changes, and more delineation between the heritage structure and the new tower (through the use of pillars/pylons). A more transitional change in height would be more appropriate rather than the 'dramatic scaling up to the remainder of the proposed development in the west of the site' (LC HIS).

2.2 B7 1952 drum malt house

The demolition of this building, which is already partially deconstructed, is generally acceptable. The proposed reinstatement and reconstruction works to the west of B5 is a positive outcome to balance the complete removal of this building. As specified in the CMP, it is strongly encouraged that a remnant drum and associated equipment from this building is retained and incorporated back into the sites landscaping and interpretation. The existing footprint of this building could be referenced in the hard landscaping. A full recording of this building and an archaeological investigation should be firmly embedded in any permit conditions.

2.3 B8 1952 concrete silos

As noted in our previous submission to P25033, the National Trust is strongly supportive of the adaptive re-use of the 1952 concrete silos into commercially serviced apartments. The retention of the painted 'SMITH MITCHELL & CO COMPANY MALTSTERS' signage and the 'VICTORIA BITTER' sign is also a positive outcome.

We do have some concern regarding the new work proposed to be attached to the silos externally and how this will impact on view lines to the silos themselves. A visual amenity analysis of the proposed works to the B8 silos could provide more clarity around these proposed addition.

2.4 B9 silos

As noted in our previous submission to P25033, the National Trust has maintained the opinion that the demolition of B9 would have a severe impact on the significance of the site and for the people of Victoria. The retention of this important iconic landmark has been a key consideration for the National Trust since the site was added to our Heritage Register in 2003/4. The plans for the B9 silos in Caydon's latest bid to redevelop the site consist of the following (LC HIS, 56):

It is proposed to demolish the seven westernmost cylinders of the B9 silos and to construct a new apartment tower to the west of the retained cylinders. The nine retained silo cylinders will be increased from RL40.20 to RL52.00. In the process the Nylex sign will be removed, placed temporarily in storage, and reinstated atop the extended silos. Retention of the nine cylinders will return the silos to the first stage of completion that existed in 1962, at which time the Nylex sign had been erected along with other signage.

The National Trust submits that this plan of retention versus demolition proposed for B9 is a generally acceptable compromise to a very substantial design challenge. Caydon should be commended for agreeing to retain over half of the cylinder drums, rather than pursuing their original plans for complete demolition. While the National Trust would strongly prefer the entirety of the silo drums be retained, we submit that this is a fair compromise and should be supported.

That being said, we have concerns regarding the proposed addition to the silos and the lifting of the Nylex sign. As specified in the CMP, 'the conservation and management of the sky sign requires it to be maintained in this location, at this height.' The National Trust submits that the most appropriate outcome for the Richmond Maltings Complex is for the current height of the silos to set the benchmark for height levels across the site. This would be consistent with maintaining the industrial aesthetic of the site, and the CMP policy to ensure the retained heritage buildings are not subsumed or overwhelmed by new development. This design response would also ensure the setting and context of the Nylex Sign is preserved.

The LC HIS notes (58):

The silos will exactly match their external form and be in a material which will distinguish the form from the original structure. In line with the cylinder extension the elevator structure will also be extended in height.

We note that information has not been provided with this application outlining the materials proposed for use. We are unable to comment further until further details have been resolved, and encourage Heritage Victoria to carefully examine this aspect of the proposal before any permit is issued.

The LC HIS notes the following (57):

In pursuing a design approach which retains part of the B9 silos and includes their extension and adaption the approach is one which recognises the landmark status of the silos and the Nylex Sign, while also accommodating the level of development required to deliver a viable redevelopment of the site.

While we acknowledge the difficulties in achieving economic viability for such a complex site, in terms of heritage considerations, this addition – as it relates to the additional height limits of the proposed adjacent towers and the silos – is not supported in its current form and with the level of architectural detail provided.

The LC HIS also specifies the following (57):

*In pursuing this design it is proposed that the retained silo cylinders and the attached elevator core will be retained **without external intervention**, thereby ensuring that the industrial aesthetic of the structure is maintained (Figure 40). While not finalised at this time, the intention is that the interior of one or more of the cylinders will be adapted for interpretation purposes and that the cylinders as a whole will be treated as a **public place and space**. They will be linked to the other heritage buildings on the site in telling the maltings story and illustrating the process. [Our emphasis]*

The National Trust strongly supports this proposed use for the retained silo drums. The realisation of this idea should be firmly embedded in the permit conditions as a non-negotiable design response. The National Trust submits that this response represents an extremely positive heritage outcome that is not only beneficial for the site, but for the entire state, creating a compelling new tourist attraction that celebrates and pays tribute to Victoria's industrial heritage. Beyond all new development proposed for the site, in terms of heritage considerations, this proposed adaptive re-use will establish an enduring legacy for Caydon moving forward. The National Trust offers their assistance in further realising this idea. A similar model as established for the Coops Shot Tower at Melbourne Centre could be explored for example. While the shot tower is partially used for retail, it is also fitted with a museum, and the centre offers a successful program of guided tours through the shot tower and up onto the roof.

2.5 B10 1956 and later malt house

We generally accept the demolition of B10, subject to a full recording and inclusion in proposed site interpretation. While this is a negative outcome for this building, it can be understood within a broader view of the site as a whole.

2.6 B11 1939-40 Barley Store

The CMP identifies this building as being of primary significance. The National Trust submits that the loss of this building is a significant one and is not accepted. Full recording, an archaeological investigation, and robust interpretation are essential mitigation responses to the loss of this building if demolition is to proceed.

2.7 Nylex Sign

As noted in the LC HIS (69-70):

Caydon has also entered into an agreement with an energy supply company for the ongoing provision of power to the sign, and to undertake 'regular preventative maintenance' to ensure the sign remains 'functional and operational' ...

... The Nylex sign is being retained and will also be repaired and restored to working order, with an ongoing maintenance plan in place, and public access provided...

... The provision of public access to the sign, and to the proposed Nylex Sign Café, although a new proposal and not historically intended or part of the original role of the sign, is also a positive outcome...

The National Trust submits that power to the sign and an ongoing maintenance plan should be a non-negotiable permit condition that will further ensure 'balance' across the site. While the benefit of 'public access to the sign' is a positive outcome in theory, how this access will work in practice

needs further clarification. It is unclear about how close the public will be able to approach the sign, and how the 'Nylex Sign Café' will interact with the retained silo drums.

2.7 New buildings

While already discussed briefly, the National Trust submits various concerns regarding the two proposed towers to be constructed to the west and south of the site, specifically the lack of architectural detail included in this permit application (LC HIS, 8: 'in the case of the Stage 2 works the plans are at a conceptual design stage and define the building envelopes and heights, but do not include detail of façade treatment or floor plate layouts'). While we agree that this detail should be provided as a condition of permit at the very least, it would be preferable if the National Trust was able to make comment on these architectural drawings and renders before providing any additional comment moving forward.

3. CMP Policies

3.1 Future uses and adaptation of buildings (LC HIS, p73):

The majority of the significant buildings on site can be adapted to a range of uses, including office or commercial use, gallery or performance space, retail and possibly also residential.
[CMP Extract]

The plans for the site do not indicate the possible use of any of the buildings for a gallery or performance space. This should be encouraged as a way of giving back to the community and facilitating creative and innovative engagement with the site.

More generally, and from a heritage perspective, it would be highly desirable if a maltings or brewing related use was retained (or reintroduced) somewhere on site. [CMP Extract]

As noted in the LC HIS (p74):

The proposal is generally consistent with this policy, albeit not all future uses for the retained heritage buildings and spaces have been confirmed.

The uses specified above should be considered in confirming these spaces, and would increase the balance across the site between viable development and public benefit.

4. Mitigation Outcomes

4.1 Landscaping

As noted in the LC HIS (p74)

The landscaping includes a combination of soft (green) and hard landscaping, including the reuse and recycling of salvaged industrial materials from the site.

The National Trust requests that the landscape plan for the site is made publically available for consultation and feedback.

4.2 Interpretation

The CMP for the site states:

Interpretation of the site would be enhanced by the inclusion of photographs and artefacts. In addition, some oral history from long-time employees would greatly assist the

interpretation of the maltings process, and explanation of the machinery and its functions, including more recent technology which may be retained and represented on the site.

Consideration should also be given to enhancing interpretation, and going beyond more static building and machinery interpretation per se, to incorporate landscaping and artworks into the site.

As referenced in regards to the landscape plan, the National Trust would like to view the proposed Interpretation Plan before commenting further. The Interpretation Plan should be developed with a clear implementation schedule of works before work is commenced on site. The incorporation of oral history and the move beyond static building and machinery interpretation is strongly supported in the development of this Interpretation Plan.

4.3 Recording

As noted in the LC HIS (p77):

Comprehensive recording is proposed with the works for all buildings and elements identified for demolition.

A detailed plan for archival recording should be developed for the site as a condition of any permit. This material should be lodged with the State Library of Victoria and could also be added to the archive of the National Trust of Australia (Victoria).

4.4 Historical archaeology

The National Trust strongly recommends extensive archaeological investigation across the site (where applicable). The Richmond Maltings Complex is a rich and complex site, with high archaeological potential. This process could be documented and shared with the community.

We commend Caydon for incorporating various compromises and positive mitigation outcomes in the current permit applications for this complex and challenging heritage site. As mentioned at the beginning of this submission, the dual permit application seems more resolved and more responsive to concerns voiced in opposition over the past year in particular. While the National Trust is supportive of Caydon's plans to redevelop the site, we submit that there are still various design considerations that should be resolved before works are able to commence. If you have any further questions, please contact our office 9656 9837.

Kind Regards,



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