



9 March 2017

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Re: Ovoid Sewer Aqueduct Park proposal

Dear Sir/Madam,

I am writing to you regarding the *Aqueduct Park proposal* published in January 2017 for public consultation. As outlined on Page 1 of the Aqueduct Park Masterplan, the proposal aims to:

- *Conserve and promote the historically significant Aqueduct structure, while improving public safety*
- *Restore public access along the Barwon River and northern bank*
- *Provide for a range of low-impact recreational activities and staged-development of visitor facilities*
- *Protect the biodiversity, cultural heritage and floodplain values of the park.*

The National Trust of Australia (Victoria) (NTAV) maintains a Heritage Register of Significant Places, including buildings, landscapes and trees. The Ovoid Sewer Aqueduct was classified by NTAV in 1987 as a place of State significance. The Statement of Significance states:

The structure is nationally significant as an early and inventive use of reinforced concrete in the Considere system ... The aqueduct was modelled on Scotland's famous Firth of Forth railway bridge and constructed between 1913–1915. It represents an internationally unusual example of this form in concrete.

Both the overall length and the maximum span length were far in excess of any other Australian reinforced concrete structure; the first structure to exceed its maximum span being the 1932 William Jolly bridge in Brisbane. The members of the aqueduct are unusually light, and of elegant proportions.

The great length and horizontal aspect across expansive flood plains—which are a significant natural habitat—constitute the aqueduct as a rare and major landscape feature.

The Ovoid Sewer Aqueduct is also on the Victorian Heritage Register (H0895) and is of architectural, historical, scientific (technical), and aesthetic significance to the State of Victoria.

NTAV supports the increase in public access to the Aqueduct Park via the use of walking trails and lookout points, which would facilitate greater visitor engagement with the natural and cultural values of the Aqueduct Park. Strategies should be developed to ensure that access is carefully managed, and that increased access across the site does not adversely impact on the natural and cultural values of the place. We encourage Barwon Water to undertake consultation with the Wadawurrung (Wathaurung Aboriginal Corporation), as the Traditional Owners and Registered Aboriginal Party, as

part of the interpretation strategy for the site. Such engagement is essential to ensure that the interpretation of the site recognises the significance of the landscape to the Wadawurrung people.

The National Trust of Australia (Victoria) (NTAV) strongly objects to the proposal to remove five spans of the Aqueduct on the eastern side. We submit that in seeking the demolition of significant fabric at a registered place, the onus is on the applicant to demonstrate that no other option is available. To date, no documentation demonstrating alternative options has been made publically available. While we support the proposal to conserve and promote the Aqueduct site, this should not be to the detriment of the recognised significance of the place to the State of Victoria. The Victorian Heritage Register citation for the Ovoid Sewer Aqueduct states:

The early and innovative use of reinforced concrete in the Considere system, which was the most innovative form of reinforcement used in Victoria, is of great significance. The aqueduct remains as a rare example of this type of concrete construction. It is also of scientific (technical) significance for its overall length and the maximum span length, both of which appear to be in excess of that of any other Victorian reinforced concrete structure at the time of construction.

The removal of five spans, approximately a third of the total span of the aqueduct structure, would have an adverse and unacceptable impact on the significance of the place, as a rare example of the *Considere* system of reinforced concrete. Furthermore the Victorian Heritage Register citation for the Ovoid Sewer Aqueduct states it “is of aesthetic significance as a major landscape feature”. We submit that the removal of up to one third of the aqueducts structure would impact on the ability to read the overall length and span of the structure, as well as impacting its significance as a landscape feature. As such all efforts should be made to conserve and maintain the aqueduct structure into the future.

Page 1 of the *Aqueduct Park Masterplan* states: “Numerous engineering investigations and rehabilitation trails have been undertaken over the last twenty years. Repair and reuse of the structure is not feasible.” In any permit application to for such work, appropriate documentation of such engineering investigations and rehabilitation trails would be required to support the conclusion that restoration of the full length of the Aqueduct is not feasible for the ongoing safety of the site. We submit that given the values of the place, and the complexities involved in the conservation of reinforced concrete, engineering assessments and costings provided with any future permit application should be peer reviewed by an independent expert selected with input from Heritage Victoria.

The *Aqueduct Park proposal fact sheet* states on page 2 that “engineering studies have concluded public access is only possible if parts of the more dangerous section are removed.” These studies should be made available to demonstrate this condition in any application for demolition of these spans. It is our view that demolition of any part of the aqueduct structure should be seen as an option of last resort, and should not be seen as a foregone conclusion.

We further note the current condition of the Aqueduct, which indicates a lack of maintenance since the structure was decommissioned in 1992. We submit that this lack of maintenance has significantly contributed to the poor condition of the structure today, and is an example of “demolition by neglect”, contributing to the deterioration in structural integrity which is now being asserted as requiring the demolition of the structure.

As such, we submit that it is inappropriate to manage the Aqueduct as a “noble ruin”, as suggested in the Masterplan, and that conservation and restoration should be pursued as the preferred approach

to managing the site. NTAV submits that the possibility of restoration should be examined seriously. Examples of potential strategies to make the structure safe to visitors include patching, encasing in new structural elements (concrete or steel), wrapping in mesh to prevent the falling spalls, or building a structure underneath to protect park visitors.

We note successful examples of the conservation of early reinforced concrete by the Cairns Port Authority at the Cairns Wharf Complex (which remains a functioning wharf), as well as Whites Creek Sewage Aqueduct, managed by Sydney Water (incorporated into a public park setting).

Thank you for the opportunity to provide feedback on this proposal. We would welcome the opportunity to discuss our concerns in more detail, and I welcome you to contact our office on 9656 9823.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'F Watson', with a long horizontal flourish extending to the right.

Felicity Watson
Advocacy Manager