

17th May 2011

B6717: DM

Robyn Hellman
Coordinator Local Policy
Strategic Planning
City of Melbourne
P O Box 1603
Melbourne
Vic 3001

Dear Ms Hellman,

**Re: Amendment C177, Rezoning of the Younghusband Woolstore Complex
2-50 Elizabeth Street, Kensington**

The National Trust of Australia (Victoria) objects to Amendment C177 on the following grounds.

Heritage Significance.

The National Trust is currently investigating the rail-based rural-industrial heritage of the North Melbourne, West Melbourne, Kensington and Macauley area. As part of this study, the Trust is considering the Younghusband Woolstore with a view to classification at a high (State) level:

- Wool was Australia's seminal industry. Even into the late twentieth century (and particularly in the 1950s) it was widely said that 'Australia rides on the sheep's back'. Large woolstores such as Younghusband are a distinctive, and the most prominent, building type which was developed for the Australian wool industry. Many have been demolished, and of these there are very few which are substantially intact.
- Younghusband Ltd is a company of national significance to the wool industry. This is a rare surviving example of a major Younghusband woolstore.

- Younghusband Woolstore at Kensington uniquely demonstrates the pattern in which woolstores moved from their original central city locations to larger sites with railway access to the port and rural hinterlands. In this it is substantially a product of major late nineteenth century infrastructure projects in Victoria:- the expansion of hinterland railways in the 1870s and 1880s; and the opening of the railway-based Victoria Dock in the 1890s. This railway-port nexus was seminal in Victoria's history, and in Melbourne's growth as a 'commercial city'.

Younghusband Woolstore, whose western façade is built alongside the main North East (Wodonga) Railway immediately adjacent to its junction with the north-central and western hinterland railways, is the most monumental and dramatic representation of this relationship in Victoria. It is also unusual among woolstores in also retaining its railway platform.

Younghusband is also the key feature of a precinct of rural based industries in the North & West Melbourne-Kensington-Macauley area. Unlike the Geelong Woolstores precinct, this is a mixed precinct, which features wool and grain related industries particularly (such as flour mills and biscuit factories) which together constitute a unique and rich demonstration of the historic shaping of urban economy and form by hinterland railheads.

- Melbourne was the first city outside the United Kingdom which developed a metropolitan hydraulic power system. As Younghusband's Kensington Woolstore was situated just outside the territory serviced by the Melbourne Hydraulic Power Company an independent hydraulic power system was built at the woolstore. Unusually, considerable relics, including a unique hydraulic crane (built by TR Carlyle of Kensington), and rams and lifts, survive at Younghusband.
- The Younghusband Woolstore architecture, featuring Romanesque and Modernist elements, would appear to be rare among surviving woolstores in Victoria.
- The Younghusband Woolstore has associations with notable figures in the wool industry, including Isaac Younghusband, Richard Goldsbrough and Thomas Sutcliffe Mort, and the company Elder Smith. It is also associated with architects Percy Oakden, Cedric Ballantyne and AW Purnell.

If the complex is determined to be significant at a higher level, this will impact on acceptable conservation management options, including Amendment C177.

Planning Issues

- *Development Plan Overlay*
 - Amendment C177 appears to be seriously flawed in terms of the objective to provide an appropriate provision for the heritage values of the place. The proposed Development Plan Overlay will presumably relegate matters which

can be considered under the Heritage Overlay to comparatively very minor issues. The essential features of the development, which has the major impact on the heritage structure, would already be approved. Critical heritage issues of would not be able to be further questioned.

This becomes more problematic as many of the heritage impacts that Amendment C177 would authorize are only to be stated and considered (by the Responsible Authority) later as part of the Development Plan Overlay. As we understand it, these would only have to be ‘generally in accordance with EG Funds Development Plan dated January 2011’, and heritage-related matters would not be subject to further submission by third parties such as the National Trust.

The proposed Schedule 10 to the Development Plan Overlay sets out numerous important heritage objectives which would not be subject to scrutiny by interested third parties such as the National Trust, and whose achievement might be compromised as a result. Notably, it requires that a ‘heritage impact assessment report which identifies the significance of the buildings and the elements worthy of retention’ must be included as part of the development plan. The Trust strongly submits that this plan should be part of the documentation provided in this amendment, so that third parties and the Panel have the opportunity to consider it.

- Similarly, the ‘Principles and objectives for new development’ contain the heading ‘Heritage’, which requires that the significance of the place should be recognized, protected and enhanced by ‘respectful’ new development. It is not clear how this can occur if all the information pertaining to heritage is not provided now as part of this Amendment C177. The information provided in relation to Amendment C177 is insufficient.
- Further, the heritage objectives propose ‘retention and adaptive reuse of the heritage buildings’. In the Trust’s view they should, as per the Australia ICOMOS Burra Charter, propose ‘appropriate’ adaptive reuse. The development authorized by the proposed DPO is clearly not the best or most appropriate means by which the cultural heritage significance can be conserved. In contrast with the present uses, it will have a major, and non-reversible, impact on the fabric of the place.

Similarly the injunction that ‘where demolition is proposed’ the new fabric which would replace it should be ‘respectful of the significance of the heritage place’ would sometimes present an impossible challenge in the view of the Trust. Yet there is no option for the Responsible Authority to reconsider the proposed demolition itself, only the impact of replacement buildings or works.

- *Heritage Overlay.*

- A number of heritage reports have been undertaken for this site, including the Graeme Butler & Associates 1985 ‘Flemington and Kensington Conservation Study’ (1985), the Living Museum of the West ‘Western Region Industrial Heritage Study’ (1989), and two reports prepared for the owner by Lovell Chen: *Heritage Appraisal* (May 2010) and *Heritage Impact Statement* (December 2010).

None of these heritage assessments of the site have been included on-line as part of the Amendment C177 documentation. Presumably applications received pursuant to the proposed Heritage Overlay will need to be informed by some heritage study and Statement of Significance. This should be a part of Amendment C177, but there is no information provided in the Amendment regarding this. A Statement of Significance is fundamental to an amendment proposing a Heritage Overlay.

- It is unclear as to what extent of the building which is proposed to remain, or to what matters, the Heritage Overlay would apply. It is not clear how much if any opportunity there will be for third parties to make submissions in the future regarding the impact of the development on heritage.

The Proposal

- *Facadism and Demolition*

Facadism is now generally a discredited form of heritage management. However it appears that the parts of the Younghusband Woolstore that are not to be demolished will be completely facaded, with only the outer walls being retained. From the information provided it seems that no internal fabric (apart from the inside of the walls), or plant, will survive. It appears that the vast clear spaces of the upper show room, which are a fundamental and integral part of woolstore design, will not survive.

Similarly, the proposed extensive demolition is unlikely to be appropriate if the significance of the woolstore is higher than has been adjudged at this time.

- *The Proposed New Apartment Tower*

The proposed 12 storey apartment building is nearly double the 6-8 stories maximum proposed as appropriate by Lovell Chen in its ‘Heritage Appraisal’ (May 2010).

The proposed tower is massive and excessive. The justification made for it is apparently that it would be the same height as a building on a different site 30 metres away. The elevations provided demonstrate that its visual impact on the woolstore is major. It overwhelms the massive industrial building, whose size all assessments agree is a key criterion of its significance. It is three times the height

of existing parapet of the Younghusband Woolstore (the railway elevation). It is at this height for nearly one third of the length of the existing Younghusband Woolstore frontage along the railway line.

Contrary to the claims of the Heritage Impact Statement, the vaunted 'powerful presence' and 'monumental quality' of the building would be significantly diminished by the massive new building set within the complex.

- *The Interiors*

The Lovell Chen Heritage Impact Statement claims that the interiors are of 'limited interest', presumably because, as is noted in the Heritage Assessment, they are without architectural 'elaboration'. The 'large repetitive open floor areas or fitouts of the late twentieth century including some of very recent origin' are the specific reasons given for their limited interest. This is unconvincing: the large open floor spaces, especially the upper showroom level, are absolutely integral to an understanding of a wool store. If lost here there is even less likelihood that this feature will be preserved in the few remaining other woolstores.

In regard to the late twentieth century fit-outs which are stated as contributing to the 'limited interest' of the interiors, they are elsewhere stated (in the Heritage Appraisal) to be light structures, presenting only superficial intrusion on the interiors. Presumably therefore they are completely reversible, and therefore intrusive at only a very low level.

The statement that some of the structural elements within Wool Store 1 'may be of some interest' avoids stating what these elements are, and how AmC177 would impact on them. There is no mention of impact on the remnants of the important hydraulic power system. There will be many other internal features which will provide critical information on the operation of the woolstore, including bale handling equipment, walkways (including the overhead walkways) for bale circulation, informative fittings and other significant elements.

- *Saw Tooth Roofing*

The saw-tooth roof is a critical element to the buildings, at least as important as the facades. It was the main functional response to wool-classing and sales floor requirements.

It is claimed that compulsory retention of the saw-tooth roof over Wool Store 1 will 'allow a continued appreciation of the scale and form of this building'. It is not clear whether this includes the most critical appreciation - from the upper internal level, and whether this level would remain unpartitioned, preserving anything of the form, scale and function of the wool showroom.

It is also proposed that the preservation of this one section of saw-tooth roof would be significant due to its visibility from outside the site. However other sections of the complexes saw tooth roof are similarly visible from distant vantage points.

- *Insufficient Information*

The information provided in relation to Amendment C177 is insufficient. No information at all has been provided in relation to issues which are critical to its assessment. For example there is no:-

- information regarding the design and materials for the new apartments which would tower above the existing building;
- artists impression of the impact of the proposed tower on critical views from the railway and western residential areas;
- drawing of the proposed new openings and changes to fenestration. The new openings and other changes proposed here are likely to be particularly sensitive, as they will also occur on the upper levels of critical facades.
- information regarding the new interiors, especially in regard to the saw-tooth roof which would be retained.

Changes to fenestration / new openings can have a major impact on the appearance and cultural significance of industrial heritage places, but it appears that such changes will have to be to the satisfaction of the 'Responsible Authority' only, and that third parties such as the National Trust will be unable to provide comment. There seems to be no compelling reason why such information could not be provided at this stage, to enable all parties to comment.

- *The Lovell Chen Reports: Heritage Appraisal (May 2010) and Heritage Impact Statement (December 2010)*

- The May 2010 report essentially appraises the woolstore in terms of its architectural values rather than its historical values and as a relatively intact and early remaining example of a major type of industrial place.
- The Heritage Impact Statement (pp 6-7) justifies the 'adverse impact' of the proposed development for two reasons:-

Firstly, it is said to be 'balanced by the positive outcomes of an adaptive reuse proposal'.

This ignores the fact that Younghusband Woolstore currently has an adaptive reuse; it is a thriving arts hub. The North and West Melbourne Precinct Association notes that: 'Artists and designers utilise the Younghusband Wool Stores as studio spaces with businesses such as the artists run 'Ironside Studios' and 'Ink and Spindle' adding much to Kensington's reputation for

creative industry.’¹ Other tenants include the Australian Ballet Store (who appreciate having a space of such dimensions in a central location), ‘Revolt Melbourne’, ‘Owl Posse’, ‘The Costume Factory’, ‘Crumpler’ bags and scenery painters (who create sets for the Australian Ballet), ‘Dance Studio’, ‘Walking with Dinosaurs’, customised furniture store ‘Deep in the Woods’, web designers puppeteers and fashion designers.

These tenants - large and small boutique creative business - greatly appreciate their woolstore spaces. Website and blog comments enthuse about its ‘exposed beams and brick’, the ‘iron door of almost mediaeval heaviness’, ‘the quiet sense of history and continuity in this former wool store .. which retains something of its bucolic past’ (including the ‘aroma’ of yesteryear).² Others confess that ‘we’re more than just a little in love with the magnificent old Younghusband Wool Store building that houses our little studio. ... We love being part of the local design community and collaborating with other creative and lovely people.’³ Artists elsewhere admit to ‘serious studio envy’ for those in ‘Kensington’s famous Younghusband Wool Store building’.⁴ The website of arts hub Revolt Melbourne announces that the ‘unique 19th Century Younghusband Woolstore provides a physical resource for arts practitioners and producers ...’.⁵ Young artists blogs describe Younghusband as a ‘really Rad building’, and tenants announce ‘our fav new neighbours’ (the latest creative tenancy).⁶ Under a photograph of Friday night drinks in the woolstore one tenant posts a report about ‘working in an old wool store building alongside a group of uber talented and creative people. Its unbelievable the kinds of things everyone comes up with in there. We have such a variety of professions, from archaeologists going on week long ‘digs’, to screen printers, graphic designers, photographers, dancers and industrial designers. The list goes on!’⁷

Younghusband Woolstore is presently home to an eclectic group of small business involved in the arts and creative pursuits who seem committed to the building. There is a need for accommodation for the creative sector of our metropolis, and old redundant industrial buildings often provide this, par excellence.

In addition to providing a wonderful venue and an exciting synergy for these tenants, this use of Younghusbands Woolstore is also perfect for an industrial site of high cultural significance. Low intensity artists studios and small

¹ <http://www.northwestmelbourne.com.au/Kensington>

² <http://www.behindballet.com/the-kensington-time-capsule/>

³ <http://thedesigntfiles.net/2008/09/ink-spindle/>; also <http://inkandspindle.blogspot.com/2010/06/younghusband-love-photoshoot.html>

⁴ <http://bespokepress.blogspot.com/2008/11/ink-spindle.html>

⁵ <http://www.artshub.com.au/au/directory/company/victoria/venues/arts-centres-venues-and-parks/revolt-melbourne-118024>

⁶ <http://www.discountuniverse.com.au/blog/2010/05/we-need-space/>; and

⁷ <http://blog.owlposse.com/2010/12/young-husband-folks/>

businesses have low impact on both the interior and exterior fabric of a place.⁸ For most redundant industrial places conversion to high-end, high impact, and irreversible new uses such as strata-titled residential apartments with a great deal of intrusive or destructive new fabric, does not present a heritage problem. However for places of high heritage significance - such as a major and now-rare building type related to Australia's seminal industry – it is not appropriate. The Lovell Chen Heritage Appraisal repeatedly refers to the 'light' nature of new fit-out and partitioning works associated with the current tenancies. These changes are apparently all 'reversible' (in the terms of the Australia ICOMOS Burra Charter), to the extent that Lovell Chen adjudges the interior of the Woolstore to be essentially intact.

The second justification for the 'adverse impact' of the proposal is stated to be that 'the fabric to be removed is not such that the overall significance of the place will be unacceptably altered or diminished in heritage value'. This is only true if the significant fabric is deemed to reside essentially in the shell of the building - the exterior walls of the major (only) buildings - and if it is thought that the significance of the sawtooth roof can be conserved by retention of a sample for interpretative purposes (apparently without the context of the large open show-floor), rather than being regarded as integral to the design of and form of Australian woolstores.

The National Trust submits that neither of the two Lovell Chen justifications for the adverse impact of the development proposal is valid.

Finally, the Trust is concerned that permission for it to inspect the interior of the building has been denied by the owner. We hope that this will be reconsidered. We are also concerned that copies of the relevant heritage studies have not been included in the Amendment documentation.

Please do not hesitate to contact myself, or David Moloney, at this office should you have any inquiries regarding the above.

Yours sincerely,

Paul Roser
Conservation Manager

⁸ Even to the extent of the vulnerable patina of the building, photographs of which are contained in some blogs, for example original simple painted signs 'Beware of Cars', or the original number painted on a timber door.