



2 December 2015

Cr Amanda Stone
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File No: B5802

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Re: Special Meeting of Council—Agenda Item 4.2 Amcor Development Plan Assessment

Dear Cr Stone,

The National Trust writes to **strongly object** to the recommendations of the Responsible Officer in the Amcor Development Plan Assessment which relate to the 1954 Boiler House.

The National Trust submits that adopting the following recommendations would constitute an **unacceptable and unjustified impact** on the heritage of this important site:

10. Built form and Interface Strategy (Fig 36 Page 51)	Specify the 1954 Boiler House “to be demolished”
Heritage Conservation Management and Interpretation 14. The draft Development Plan Volume be changed to provide for	(b) the demolition of the 1954 Boiler House

Significance of the 1954 Boiler House

The 1954 Boiler House, cited by architectural historian Simon Reeves as being the **first curtain wall building in Victoria**, has been assessed as being of individual local significance by a number of different heritage experts, including in the Conservation Management Plan prepared by Lovell Chen (2014). Accordingly, the building is identified in HO70 in the Schedule to the Heritage Overlay of Yarra.

The building’s significance is further evidenced by its inclusion in the Royal Australian Institute of Architects Register of Twentieth Century Architecture and Works, as well as the Docomomo Australia Buildings Register (Australian working party for documentation and conservation of buildings, sites and neighbourhoods of the modern movement).

As well as constituting an unacceptable heritage impact on the individual building, the loss of the 1954 Boiler House would have a detrimental impact on the Industrial Heritage Precinct, as identified in the Development Plan:

at the southern end of the site the combination of 1920 Boiler House, the 1954 Boiler House and the River Pump House, with the ensemble of surrounding remnant water and power infrastructural elements such as tanks and chimneys,

together provide a significant opportunity to provide an in-situ understanding of earlier operations on the site.

The Trust further submits that the demolition of the 1954 Boiler House would have an unacceptable impact on the important view lines identified in the Development Plan (p 32), including views from Heidelberg Road, Chandler Highway and surrounding suburban streets.

Comments on Officer's Report

The primary reasons outlined in the Officer's Report for earmarking the 1954 Boiler House for demolition relate to the logistics of asbestos remediation, as well as issues with the "likely adaptability of the building into a useful space" which "is understood to be very limited". However, the report provides no evidence to justify this statement, or provide a basis for the claim that the "likely adaptability ... is understood to be very limited".

The Officer's recommendation also claims that "[decontamination] in itself would not strictly be appropriate from a technical heritage perspective". The National Trust submits that no basis has been provided for this assessment, and that the appropriateness of decontamination works from a heritage perspective should be the subject of a detailed Heritage Impact Statement, and not pre-empted at Development Plan stage.

The Trust also notes that a significant investment would be required to safely demolish the building given the presence of asbestos. We submit that this investment should rather be made in the remediation of the building to allow adaptive re-use, and that it is the developer's responsibility to do so.

Conclusion

Put simply, it would be completely unacceptable to earmark one of the only significant heritage buildings on this important site for demolition in the Development Plan, without further due diligence.

The National Trust strongly urges you and your fellow councillors to **REJECT the officer recommendations above**, and defer decision-making on the future of the 1954 Boiler House until the next stage of planning approvals, as outlined in the Officer's report (ie "various planning applications lodged generally in accordance with approved Development Plan").

If you have any questions about the National Trust's objections, please don't hesitate to contact Felicity Watson, Senior Community Advocate, on 9656 9818 or 0432 672 275.

Yours faithfully,



Paul Roser
Senior Manager, Advocacy and Conservation