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Mr Damien Welch  
Hearings Coordinator  
Heritage Council of Victoria  
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Melbourne VIC 3001

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File no.: B5802

**Re: Registration Hearing Submission—Power Station B (1954 Boiler House) at the Former Amcor Papermill, 626 Heidelberg Road, Alphington**

Dear Mr Welch,

The National Trust of Australia (Victoria) has advocated for the cultural heritage significance of Power Station B (1954 Boiler House) since 2015 when it lobbied the City of Yarra to reject the recommendations made by the Responsible Officers in the *Amcor Development Plan Assessment* specifically relating to the proposed demolition of the place (letter attached Appendix A). At this time, the National Trust strongly argued that the demolition of Power Station B would have an unacceptable and unjustified impact on the established cultural heritage significance of the place. This established significance was based on the assessment of multiple heritage experts and reports, including research undertaken by noted architectural historian Simon Reeves of Built Heritage Pty Ltd, the preliminary report to the City of Yarra undertaken by Biosis Research Pty Ltd in 2007, the assessment undertaken by Lovell Chen in the 2013-4 Conservation Management Plan, the peer review of an earlier Lovell Chen report undertaken by Context Pty Ltd in 2013, and the *City of Yarra Heritage Review* undertaken by Allom Lovell & Associates in 1998 and other subsequent reports commissioned by Yarra City Council to determine the cultural heritage significance of the place for inclusion in the Schedule to the Heritage Overlay (for which it is individually listed HO70). The inclusion of the place in the Royal Australian Institute of Architects Register of Twentieth Century Architecture and Works, and on the DOCOMOMO Australian Buildings Register, adds further weight to this established significance.

In response to the matter before us today, the National Trust strongly supports the Executive Director's recommendation that Power Station B (1954 Boiler House) is of cultural heritage significance and should be included in the Victorian Heritage Register. The National Trust submits that the cultural heritage significance of the place at the State Level has been clearly established in the nomination to Heritage Victoria, and in the subsequent Assessment of Cultural Heritage Significance prepared by Heritage Victoria for the Heritage Council of Victoria.

We submit that the place meets the following criteria set by the Heritage Council (as laid out in the published Victorian Heritage Register Criteria and Threshold Guidelines). We note that the minimum requirement for the inclusion of a place on the Victorian Heritage Register is reaching the State threshold for one criterion.

**Criterion D: *Importance in demonstrating the principal characteristics of a class of cultural places and objects***

The National Trust supports the recommendation made by the Executive Director that Power Station B is architecturally significant and likely satisfies the threshold for Criterion D at the State Level. This recommendation is based on the assessment of Power Station B as a notable example of a highly intact and early representation of Post-War International design, specifically through ‘the extensive use of curtain wall design and [glazing] technology’ (pg. 6). While neglect has seen the condition and integrity of Power Station B deteriorate since its closure in 2011-2 (including broken glass and graffiti), recent photographs clearly emphasise the cultural heritage significance of the place still evident in the remaining physical fabric, including the notable use of rectilinear design, sleek, flat and unornamented planes, and the extensive use of glass and steel (figures 1-3 below). As noted by the ED, while ‘damage and vandalism has led to the loss of some doors, windows and sections of roof’, the exterior form of Power Station B is highly intact, the chimney stack associated with the boiler house is highly intact, and the southern conveyor remains intact (pg. 18). Overall, the use of the ‘continuous sheer metal-framed glass curtain walling’, and the innovative function of this walling ‘as a transparent skin to reveal the machinery contained within’, as highlighted by the ED and others, remains highly intact and clearly visible (pg. 5). As further noted by the ED:

*The significant elements of Power Station B, namely the curtain glazed boiler house and turbine hall, steel chimney stack and brick service core, retain their significance and presence on the site (pg. 18).*

**Criterion F: *Importance in demonstrating a high degree of creative or technical achievement at a particular period***

The National Trust supports the recommendation made by the Executive Director that Power Station B is scientifically/technologically significant at the State Level and likely satisfies Criterion F as ‘one of Victoria’s earliest examples of glazed curtain walling in the modern sense, consisting of a non-structural infill of continuous metal-framed glazing that is uninterrupted by structural elements’ (pg. 7). As noted by the ED, earlier attempts at curtain walling ‘did not achieve the continuous effects of such extensive sheer glazing, extending over the equivalent of nine stories (27.7m), as seen at Power Station B’. In a comparative analysis of the place, the ED highlights and acknowledges that Power Station B ‘pre-empted similar expressions that were seen in a subsequent range of designs’, as evident throughout the state of Victoria (pg.7). As noted in the original nomination of the place:

*While not published until 1954, Power Station B was designed as early as 1951 and already well under construction in 1951-2, thus significantly predating other early examples of curtain-walling in Victoria, which included a number of factories, office buildings and other buildings designed between 1952 and 1956 (pg. 7).*

The ED further reinforces the significance of Power Station B, insofar as it reaches the threshold for Criterion F, by highlighting the building’s technical achievement recognised in multiple articles and publications dating to the time of its construction (and subsequently). As outlined by the ED:

*Architectural journals in the 1950s published numerous articles on the new power station structure. This included the article 'Power House – Melbourne, Australia, 1951, Mussen, Mackay and Potter – Engineers and Architects' in Architecture & Arts in September 1952, and a comprehensive article titled '£300,000 Glasshouse' in Architecture & Arts, February 1955. In 1956, the building was included in the 1956 publication Guide to Victorian Architecture, produced by the Royal Victorian Institute of Architects for the Olympic Games, to showcase the contemporary design and technology of the state's industrial complexes (pg.7).*

The range and breadth of the sources listed above clearly establishes the cultural heritage significance of the place in terms of its scientific/technological contribution to the State of Victoria.

**Criterion B Possession of uncommon, rare or endangered aspects of Victoria's cultural history**

While the ED has not recommended that Power Station B reaches the threshold for Criterion B, the submission prepared by Geoff Ashely for Ashley Built Heritage Pty Ltd (received during s.38 notification), argues the following:

*Documentary evidence in contemporary journals shows a conscious association with the development of curtain wall International style buildings in Australia. The characteristics of the curtain wall design are also evident in the fabric, and the place is rare or uncommon. In relation to rarity, and in response to those who may wish to point to other curtain wall examples existing, I would say this represents an early and now rare example of a seminal curtain wall construction utilising industrial walling structure.*

While many of the points outlined above have been identified by the ED in reference to Criterion D and F, the National Trust suggests that this Criterion be tested during the Registration Hearing by the Heritage Council.

**Criterion E Importance in exhibiting particular aesthetic qualities**

While the ED has not recommended that Power Station B reaches the threshold for Criterion E, the submission prepared by Geoff Ashley (received during s.38 notification) argues that it may, highlighting the 'high aesthetic value [of the place] as a landmark structure clearly seen from many places including south of the Yarra River and along the Chandler Highway'. Further, Ashley contends that 'the prominent visibility of the building, including its curtain wall, was a deliberate part of the design concept and a promotional strategy for APM'.

For the reasons outlined by submitter Geoff Ashley, the National Trust submits that Criterion E may be satisfied at a State Level, and should be tested during the Registration Hearing by the Heritage Council.

Recent photographs of the place, taken in 2016 and 2017 respectively, highlight the landmark qualities (and level of intactness) of Power Station B from multiple vantage points.



Figure One: Northwest elevation, August 2016, source: Heritage Victoria



Figure Two: North elevation, August 2016, source: Heritage Victoria



Figure Three: from Alphington Park, March 2017, source: DOCOMOMO

### **Extent of Registration and Curtilage**

The National Trust submits that while the Extent of Registration proposed by the ED is the absolute minimum necessary, it is generally acceptable. If the landmark qualities of the place from the Chandler Highway were to be established under Criterion E, a consideration of this extent would need to be taken into account the need to protect the setting of the place and key views.

### **Permit Policy and 'Overview of Significance'**

The National Trust notes the 'overview of significance' as outlined by the ED in reference to the cultural heritage significance of the place and the proposed permit policy (pg. 9). The National Trust submits a level of hesitancy in supporting the delineation of significance in such a way. As has been

illustrated in many instances, as time passes, specific buildings included in the extent of registration that have been delineated as 'contributory' can increase in significance, yet are locked to this initial assessment. As the steel chimney stack and coal conveyor are both specifically mentioned in the proposed 'what is significant', this delineation of significance should not be attached to the registration.

The National Trust supports the ED's assessment that a permit should be required for 'removal of internal equipment and machinery that is interconnected with the steel frame which supports the glazed curtain walling' (pg. 9). This aspect of the building has been clearly identified as directly contributing to the cultural heritage significance of the place.

### **Policy Exemptions**

The National Trust accepts and supports the specific exemptions outlined by the ED in the assessment of the cultural heritage significance of the place. The ability to remove non-original items (e.g. air conditioners, pipe work, ducting etc.), the removal of graffiti, the removal of broken glass and the requirements to secure the site for current and future safety reason, and the erection, repair and maintenance of directional road and safety signage are all reasonable exemptions that align with the cultural heritage significance of the place, and allow for the potential realisation of a program of 'adaptive re-use' (pg. 10). The ability to decontaminate the soil, removal internal equipment and machinery **that is not interconnected with the steel frame which supports the glazed curtain wall** (our emphasis), and the demolition (or repair) of the brick boundary wall along the Chandler highway are also acceptable exemptions (pg. 11).

### **Asbestos contamination**

As a consideration that has arisen multiple times by objectors who oppose the inclusion of Power Station B in the Victorian Heritage Register, the National Trust would also like to address the existence of asbestos contamination within the built fabric of the place. Primarily, the National Trust submits that the existence of asbestos contamination does not relate to the cultural heritage significance of the place, and as such is not a relevant consideration to this hearing. If this contamination is determined to be relevant by the Heritage Council, we submit that asbestos was a widely used material in the late nineteenth/throughout the twentieth century, and is evident in many buildings with and without cultural heritage significance throughout Victoria. As taken from precedent, the existence of asbestos at a place does not disqualify it from assessment. For example, in June 2016, the Heritage Council determined that the Former Benalla Migrant Camp 'is of cultural heritage significance and should be included in the Heritage Register', even though 'the huts were constructed using a standard P1-type design with timber frames, gabled ends, horizontal corrugated iron wall cladding, and corrugated iron or asbestos cement roof cladding'.

As proven in multiple instances, asbestos can be removed safely without compromising cultural heritage significance. The National Trust in particular supports the research and conclusions drawn by Geoff Ashley in the submission received during s.38 notification:

*The patent glazing curtain wall of the building comprises rows of glazing panels held in place by asbestos 'ropes' as cushion seals under vertical mullions that are bolted to horizontal girts. Given this construction, I believe that it should be technically possible to partly disassemble the curtain wall by unbolting and temporarily removing the mullions, liberating the asbestos ropes and replacing the asbestos with another product. While the work would*

*need to be done with OHS guidelines, I believe that this would be no more difficult than the removal of asbestos that is done routinely from buildings using appropriate processes and accredited contractors.*

As further outlined by the National Trust in a letter to City of Yarra Councillors regarding the *Amcor Development Plan Assessment (2015)* (Appendix A):

*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 developers responsibly to do so.*

The National Trust maintains that the appropriateness of decontamination works from a heritage perspective, specifically relating to the asbestos evident in the built fabric of the place, should be the subject of a detailed Heritage Impact Statement at the heritage permit level, rather than pre-empted and disputed in the assessment of the cultural heritage significance of the place.

### **Conclusion**

In summary, we support the inclusion of the Place on the Victorian Heritage Register. Should you have any queries regarding the above, please contact me on 9656 9837.

Kind regards,



Felicity Watson  
Advocacy Manager  
National Trust of Australia (Victoria)

Appendix A: National Trust of Australia (Victoria) Letter 'Special Meeting of Council – Agenda Item 4.2 Amcor Development Plan Assessment', 2 December 2015