



21 March 2018

Mr Steven Avery
Executive Director
Heritage Victoria
8 Nicholson Street
EAST MELBOURNE VIC 3002

6 Parliament Place
East Melbourne
VIC 3002

Email: conservation@nattrust.com.au
Web: www.nationaltrust.org.au

T 03 9656 9818

Re: Permit application P27900 for Part demolition, conservation, and security related works, West Block Southern Extension, Newport

Dear Mr Avery,

The National Trust of Australia (Victoria) objects to the above Permit Application relating to the West Block Southern Extension located at the Former Newport Railway Workshops site.

We submit that the stated justification for the works—"the practicality of securing the site and rendering it safe and manageable following the 2015 fire damage"—is insufficient to warrant the proposed demolition of buildings identified as being of Primary and Contributory significance to the site, and does not align with the National Trust's vision that "Our diverse heritage is protected and respected, contributing to strong, vibrant and prosperous communities."

Specifically, we object to the demolition of the following buildings in the West Block Extension proposed for demolition, including:

- Machine Shop Extension and Garage
- Truck Building Yard
- Westinghouse Brake Shop
- Smithy Annexe
- Blacksmiths Extension

All of the above buildings are identified in the Conservation Analysis and Management Plan completed by Helen Lardner Conservation and Design in October 2000, as being of Primary significance, apart from the Machine Shop Extension and Garage, which is identified as being of Contributory significance. As clearly outlined in the Statement of Significance, the subject site is highly significant because the complex of buildings—as a whole—demonstrates a period of change and expansion at the Workshops, which is still evident in the existing fabric. The demolition of the above buildings would therefore compromise this identified significance.

We note that the exhibited Heritage Impact Statement prepared by RBA Architects + Conservation Consultants, dated September 2017, does not provide any detail on the conservation policies for the subject buildings contained within the Conservation Analysis and Management Plan referenced in the Permit Policy (HIS, p 21). Without access to this document, it is difficult to provide an informed response to the proposal, and we encourage Heritage Victoria to make all relevant documentation available for consideration during the advertising period for Permit Applications.

We also note that there does not appear to be an overarching masterplan for the site to guide the works, and that no specific uses for the buildings have been identified in the application. It is our view that the demolition of fabric without an identified use is speculative, and not in accordance with the *Burra Charter*, or the *Victorian Government Cultural Heritage Asset Management Principles, December 2009*. It is highly concerning when the owners of heritage places, particularly those on public land, seek to “clean up” those places and remove fabric from certain periods, in lack of cognisance to the contribution of many periods to the significance of a particular place.

From the documentation provided, it is clear that an extensive suite of maintenance and restoration works is warranted, however we submit that the demolition of fabric of Primary significance cannot be balanced against the restoration of other buildings of Primary significance. We note the following requirements under Sections 152 and 153 of the *Heritage Act 2017*:

The owner of a registered place or registered object must not allow that place or object to fall into disrepair.

The owner of a registered place or registered object must not fail to maintain that place or object to the extent that its conservation is threatened.

While there are currently no guidelines regarding minimum standards of repair under the Act, we would consider it essential to ensure that registered buildings are appropriately maintained and secured, and adequately insured. So while we commend VicTrack for developing a suite of repair and restoration works, we do not consider that simply meeting the obligations of the Act provides adequate justification for the demolition of significant fabric.

We further note that no argument has been made by VicTrack regarding the economic viability of retaining and restoring all fabric of primary significance, and we submit that such an assessment should only be made when there is an identified use for the site.

In conclusion, we strongly object to the current permit application. We do not consider that the inclusion of Permit Conditions could mitigate the impacts of the current proposal, and submit that the application should therefore be refused. We are of course however supportive of ongoing conservation and repair works. We appreciate the opportunity to provide feedback on the proposed works, and would welcome further consultation with VicTrack on the future of this important place.

Yours faithfully,



Felicity Watson
Advocacy Manager

CC: Ms Enid Hookey, President
National Trust of Australia (Victoria) Inner-West Branch