



2 May 2023

Mr Steven Avery  
Executive Director  
Heritage Victoria

heritage.permits@delwp.vic.gov.au

6 Parliament Place  
East Melbourne  
VIC 3002

Email: [conservation@nattrust.com.au](mailto:conservation@nattrust.com.au)

Web: [www.nationaltrust.org.au](http://www.nationaltrust.org.au)

T 03 9656 9818

**Re: Objection to Permit Application P32180, Former Maribyrnong Migrant Hostel, 61-71 Hampstead Road, Maidstone**

Dear Mr Avery,

The National Trust of Australia (Victoria) objects to the above permit application for demolition works, tree removal and site decontamination works and construction of a tram maintenance facility and stabling yards including the provision of a new site access road from Hampstead Road, and the introduction of noise walls.

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing more than 40,000 members and supporters across Victoria.

While we understand the pressures for growing the capacity of Victoria's public transport system, and the required Tram Maintenance Facility, we are not satisfied that the proposed extent of demolition and tree removal has been sufficiently justified in this permit application. We believe the large-scale removal of significant heritage fabric and environmental destruction proposed would result in an unacceptable impact on the cultural heritage values of the site and be contrary to the sustainable commitments of the Department of Transport and Planning.

**Appropriate Use**

The Heritage Victoria ['Principles for considering change to places in the Victorian Heritage Register' \(2022\)](#) notes under Principle 2.,

*A cautious approach - In accordance with the Burra Charter, Heritage Victoria supports a cautious approach to change at places in the Victorian Heritage Register: do as much as necessary to care for a place and to make it useable, but otherwise change it as little as possible so that its significance is retained...change may be necessary to retain cultural significance, but is undesirable where it reduces cultural significance. The significance of a place should always be respected.*

We understand that due to vandalism, lack of maintenance and significant amounts of asbestos across the site, there are various barriers to adaptive reuse in this case. The National Trust also supports the adaptive reuse of heritage buildings to ensure they have an ongoing purpose and remain viable assets to their communities. However, we find the extent of demolition required by this permit application indicates the proposed use is inappropriate for

the site, as the change would contemplate major interventions disrupting the setting and producing an unacceptable negative impact on the cultural heritage significance of the place.

### **Retention of Built Heritage and Demolition by Neglect**

We hold concerns regarding the large-scale demolition proposed for the site, and the potential for that loss of heritage fabric to continue across the eastern half of the registered site (balance of the site) in the future. Aside from the relocation of the Nissen Hut (B2), there appears to have been little consideration given to retaining heritage fabric. GJM's Heritage Impact Statement notes multiple times,

*...it is acknowledged that the proposed demolition will have substantial visual and physical impacts on the western half of the heritage place.*

Given the above statement, we refute the claim in the Heritage Impact Statement that,

*the western section was nominated for the TMF on the basis that works in this area could avoid impacts to the 'heritage core,' and offered the greatest opportunities for retention of trees and buildings on the balance of site.*

The National Trust views the entirety of this site to be at risk of Demolition by Neglect and does not view any one half of this site to have more heritage significance for the state of Victoria than any other part. This statement further indicates that features such as the Phillip Centre, the Aviary, the Vietnamese Mural, the planned plantings and landscapes, the Midway Hostel, and more, are not considered part of the 'heritage core' of the site, despite being cited in the Former Maribyrnong Migrant Hostel Statement of Significance on the Victorian Heritage Register.

In particular, the National Trust strongly encourages the retention of the Vietnamese Mural (F3) either in situ or through relocation. The expert reports provided for this feature by International Conservation Services and Hatch Consulting state that it is possible to retain and relocate the art piece and every effort should be made to secure its retention. ICS notes that, "evidently, there is great potential for graffiti removal and conservation treatment of the Vietnamese mural," while Hatch consultation supported this in their report, stating that "Should the graffiti be able to be easily removed and the mural can be reserved, we do not perceive any issues with this project." While the proposal to replace the mural with interpretation by descendants of that community is appreciated, it would be far more desirable to salvage the original fabric, which is possible and aligns with the principle of The Burra Charter to do 'as much as is necessary but as little as possible'.

### **Tree Removal and Landscape Protection**

The current permit application proposes the removal of at least 720 trees and the retention of only 372. The Arboriculture Report by Greenwood Consulting recommended only 117 trees be removed due to their poor health/structure, however the current proposal suggests removing more than 6 times that amount including a number of high to very high retention value trees. Considering the current climate emergency, more consideration should be given to the preservation of trees in this project.

The trees that form the gardens of the Phillip Centre are of particular concern. These gardens are noted in the site's Statement of Significance on the Victorian Heritage Register,

*A landscaped garden was created inside the ring which was planted with native trees and shrubs. The accommodation units either looked out into this garden or out of the ring into the wider landscape.*

These trees and shrubs are the only ones on the heritage listed property which are specifically mentioned in the Statement of Significance; however, it is proposed to remove them all. While the Phillip Centre buildings are in a poor state, the trees that form the gardens consist of many trees in good health and there are even some with high to very high retention values.

The Heritage Impact Statement composed by GJM Heritage notes,

*that the existing plantings contribute to the architectural (aesthetic) and historical values of the Former Maribyrnong Migrant Hostel by providing a generally open landscape setting, and by demonstrating patterns of community engagement where plantings were planted by hostel occupants and staff.*

Yet none of these trees are proposed for retention or translocation. The Heritage Impact Statement also states,

*It is noted that these values will remain extant, undisturbed and readily legible outside of the area of works in the balance of site. Nonetheless, it is acknowledged that the proposed tree removal will have substantial visual and physical impacts on the western half of the heritage place and its setting.*

The National Trust believes that these values cannot be extant outside of the area of trees specified in the Victorian Heritage Register (the significant gardens around the Phillips Centre).

The Heritage Impact Statement report also states that,

*There is very limited capacity to retain any existing trees in the area of works due to construction constraints. Some opportunity may exist for the retention of up to 53 trees, particularly in the area nominated for stormwater management, which will be explored during construction planning and detailed design.*

We urge that alternative designs for the Tram Maintenance Facility be investigated so that the retention of trees can be increased. While the species selected for the landscape proposal area are appropriate, the landscape area is too small (such as the proposed forecourt at the entrance of the Administration Building). The Phillip Centre Garden to be cleared is approximately 1.7 ha in area (this does not include other vegetated areas where works will take place). The area nominated for landscaping and stormwater management/drainage basin (which has the potential to retain 53 trees) and the forecourt are approximately 0.6 ha in total. The Landscape Design in the forecourt area allows for only 5 trees to be planted which does not compensate for the 720 trees to be removed. The interstitial spaces such as the landscape buffer and car parks are small, scattered and do not reflect the heritage values.

### **Heritage Interpretation**

The National Trust believes any heritage interpretation of the site should include all eras of heritage significance noted in the heritage citation. We note there is a lack of intended

interpretation regarding the New Pyrotechnic era of the site which is a significant part of the site's heritage value.

We also support the recommendations from GJM Heritage in the Heritage Impact Statement to provide a more in-depth interpretation plan and encourage the use of legible interpretation within the architecture. The National Trust recognises that the proposed works would necessitate the site remain inaccessible to the public, so interpretation that is visible and understandable from the public domain is important, as is the inclusion of interpretation within the Tram Maintenance Facility itself.

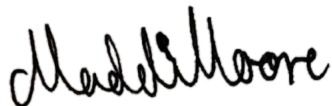
### **Security and Ongoing Maintenance**

Additionally, the National Trust submits our concern regarding the ongoing security and maintenance of the entire site. We encourage the dedication of significant resources to the minimum security and maintenance of the whole site (including the balance of the site) to prevent the further deterioration of the built fabric from vandalism and trespassing and to ensure the protection of its heritage values. Significant resourcing should also be provided for creating a photographic record and photogrammetry prior to any proposed demolition.

### **Conclusion**

In conclusion we understand the constraints of the site as it currently stands and the positive benefits of the proposed Tram Maintenance Facility. However, we have various concerns regarding the widespread demolition of key elements that contribute to the significance of the Former Maribyrnong Migrant Hostel site, and the reluctance to retain heritage fabric and cultural heritage values as possible. We believe this permit would cause an unacceptable impact on the cultural heritage significance of the place. For any enquiries regarding this submission, please get in touch with this office on 9656 9818 or with me directly at [madeleine.moore@nattrust.com.au](mailto:madeleine.moore@nattrust.com.au).

Yours faithfully,



Maddi Moore  
Acting Manager, Advocacy  
National Trust of Australia (Victoria)