

# PACIFIC CARPETS

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## HERITAGE IMPACT STATEMENT

35-65 Paramount Road and 99 Olympia Street, Tottenham VIC 3012

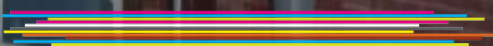
October 2022

Prepared for

**COWES BAY GROUP**

Prepared by

**LOVELL CHEN**



## Quality Assurance Register

The following quality assurance register documents the development and issue of this report prepared by Lovell Chen Pty Ltd in accordance with our quality management system.

| Project no. | Issue no. | Description               | Issue date | Approval |
|-------------|-----------|---------------------------|------------|----------|
| 9864        | A         | Heritage Impact Statement | 2022.10.26 | PL       |

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Cover image: East elevation of 1940s former dye-house to Paramount Road (Building E)

Source: Lovell Chen 2022

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## 1.0 INTRODUCTION

This Heritage Impact Statement (HIS) has been prepared on behalf of Cowes Bay Group to accompany a permit application to Maribyrnong City Council for the redevelopment of the former Pacific Carpets site (also known as the British Australian Carpet Manufacturers site) at 35-65 Paramount Road and 99 Olympia Street, Tottenham (Figure 1).

In preparation of this report, reference has been made to architectural drawings, prepared by Qanstruct Pty Ltd dated 18 October, Revision B and numbered as follows:

- TP00 – TP03 (inclusive)
- TO10 – TP11
- TP20
- TP22 – TP23
- TP25 – TP26
- TP30
- TP32 – TP35 (inclusive)
- TP40
- TP42 – TP43

Further, reference has been made to the landscape drawings, prepared by John Patrick Landscape Architects, dated October 2022 and numbered TP01 - TP05 (inclusive).

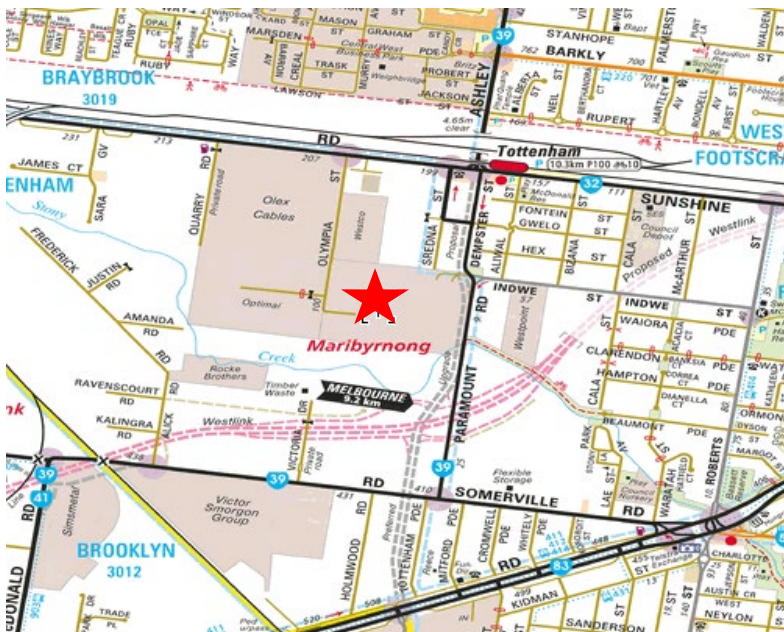


Figure 1 Plan showing the location of the subject site, indicated by the red star

Source: [www.street-directory.com.au](http://www.street-directory.com.au)

## 2.0 HERITAGE CONTROLS AND LISTINGS

### 2.1 Maribyrnong Planning Scheme

The property is individually identified as 'Pacific Carpets' which is included as HO152 in the Schedule to the Heritage Overlay of the Maribyrnong Planning Scheme (Figure 2). As such the property is subject to Clause 22.01 'Cultural Heritage Policy' and Clause 43.01 'Heritage Overlay'. The heritage controls apply to the external fabric of the existing building and the land extent; external paint controls, internal alteration controls and tree controls do not apply to the place.

## 2.2 Statement of Significance

The statement of significance for the former Pacific Carpets site is included in *the Maribyrnong Heritage Review – Volume 3, Historic Places, Industrial places in the City of Maribyrnong*, prepared by Jill Barnard, Graeme Butler, Francine Gilfedder and Gary Vines in 2000. This is as follows:

Pacific Carpets is of regional historical and architectural significance for its important historical role in the development of the carpet textile industry in Melbourne and for its distinctive and unusual architectural form.

Felt & Textiles pioneered the Carpet industry in Australia by manufacturing plain and stippled Wilton Body Carpet in 1937 at Footscray. After an interruption caused by World War II the company was instrumental in developing the manufacture of Spool Axminster carpets in Australia. (Criterion D2) To accommodate this major undertaking a new factory was built in Tottenham in a modern and functional design. The factory design expresses the changed nature of an industry which not many years before had been a craft unknown to Australia and in the course of a few years had been introduced as a major manufacturing enterprise, completely bypassing the phase of craft workshop manufacture which had preceded industrialisation of carpet making in England.

The unique use of corrugated cladding in this up-to-date Modern composition gives the building a special position in the evolution of industrial architecture in the region and with the prominent tower, is a local landmark. (Criterion F1) <sup>1</sup>

It is noted that only part of the site is included in the HO; this includes the earlier buildings (see Section 3.2).

### 2.2.1 Property Grading

The property is identified as a place of regional significance in the *Maribyrnong Heritage Review*. The Review notes that the criteria used in the identification and assessment of heritage places was the criteria adopted by the then Australian Heritage Commission.<sup>2</sup>

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<sup>1</sup> Jill Barnard, Graeme Butler, Francine Gilfedder & Gary Vines, *Maribyrnong Heritage Review Vol. 3: Historic Places* (2000), pp.157-59.

<sup>2</sup> Jill Barnard, Graeme Butler, Francine Gilfedder & Gary Vines, *Maribyrnong Heritage Review Vol. 3: Historic Places* (2000), p.2.

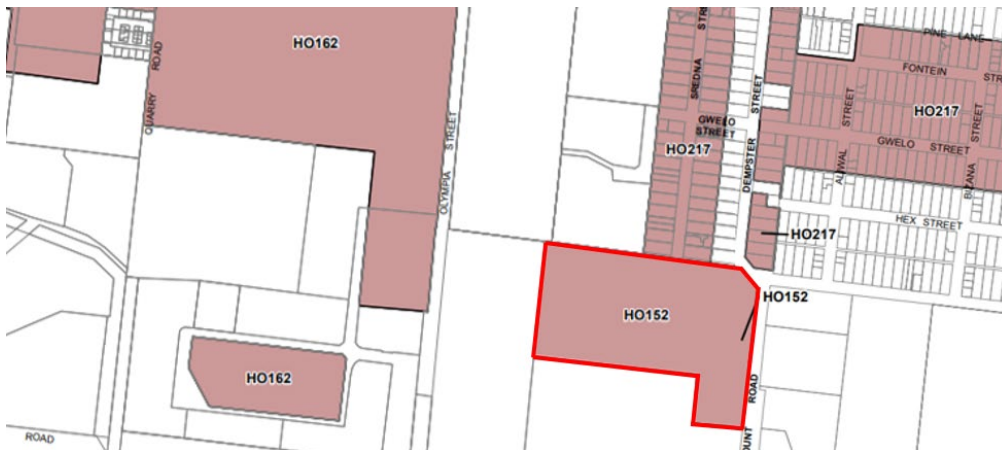


Figure 2 Detail of Heritage Overlay map with subject site indicated (HO152)  
Source: Maribyrnong Planning Scheme

### 2.3 Victorian Civil and Administrative Tribunal P1647/2020

In 2020 a proposal for re-development of the site was lodged with the City of Maribyrnong. This proposed the demolition of various structures, construction of new buildings, use of the land for the purpose of warehouses and ancillary offices, removal of vegetation and reduction of car parking requirements.

Council refused the application on grounds broadly relating to heritage and urban design, with concerns around the extent of demolition of the existing buildings and uncertainty around the use of the proposed warehouses.

The decision was appealed to the Victorian Civil & Administrative Tribunal (VCAT) in April 2021 (P1647/2020). During the hearing, Ms Anita Brady, a heritage consultant, provided an expert witness statement on behalf of Maribyrnong City Council. Ms Brady's evidence noted:

that the significance of the buildings as industrial buildings can also be derived from the saw-toothed roof form, based on the reference to these in the heritage citation and the fact that such forms are descriptive of historical industrial use and development.<sup>3</sup>

Ms Brady's evidence on the extent of demolition that could occur to the various buildings was as follows:

- Replacement of some external materials may be required but any new materials should aim to maintain the existing the fabric as far as is possible.
- Building E – 8-10 metres of the building should be retained, as this is what is most visible from the public realm along Paramount Road.
- Building F and G – total demolition is not supported with the tower to be fully retained. A depth of in the order of 6-8 metres of the office building may suffice with the north and east elevations retained including the architectural treatment on the ground floor eastern side.

<sup>3</sup> Victorian Civil and Administrative Tribunal (VCAT), BMF Construction Pty Ltd v Maribyrnong City Council, VCAT Ref. P1647/2020, p. 11 (point 42).

- Building D – total demolition is considered acceptable, as future development may block publicly visible views and it is not as prominent as other buildings on the site, especially from the north.
- Building C – although not proposed, partial demolition of this building could occur to assist in providing developable area on the site. Retention of the northern parts of the building, including some of the saw-toothed bays should be achieved as evidence of original building form.<sup>4</sup>

The Tribunal advised that a more balanced outcome was required between the demolition of entire buildings and the retention of the site's heritage assets. The focus and retention should be on what is visible from the public realm (Paramount Road and Sredna Street), this being the saw-tooth roof form and eastern elevation of Building E, as well as elements of buildings F and G, including the tower.

The Tribunal found that the recommendations of Ms Brady in relation to retention of heritage fabric / existing buildings were sound and a new proposal would be required.<sup>5</sup> The decision of the Maribyrnong Council was affirmed, and no permit was granted.<sup>6</sup>

### 3.0 HISTORY AND DESCRIPTION

#### 3.1 Brief History

The British Australian Carpet Manufacturing Company (BACM) was formed in 1941 after the merger of the Wilton Carpet manufacturing arm (the first carpet weavers in Victoria) and the Carpet Manufacturing Company Ltd., an English company well known for their Axminster carpets.<sup>7</sup> The company acquired land in Tottenham and commenced construction of manufacturing facilities and an office in 1949. BACM became one of the first manufacturers of Axminster carpets in Australia.<sup>8</sup>

From 1949 the first buildings were constructed on the site. These included a sawtooth manufacturing building (Buildings C and D); a galvanised corrugated iron and asbestos cement clad office/amenities building with water tower (Building F) and a brick dye-house (Building E) to Paramount Road (Figure 3). Several more buildings were constructed as the manufacturing business grew, including a boiler house (now demolished) and extensions to the original sawtooth buildings within the site (Figure 4). The original main entry to the site was from Sredna Street to the north. The growth and development of the site is illustrated in the aerial photos at Figure 5 to Figure 8. In 2007 carpet manufacturing at the site ended when it was acquired by Godfrey Hirst. The site is still used, however in a limited capacity and carpet manufacturing no longer takes place.

<sup>4</sup> Victorian Civil and Administrative Tribunal (VCAT), *BMF Construction Pty Ltd v Maribyrnong City Council*, VCAT Ref. P1647/2020, pp. 11-12 (point 43). It is noted that building identifying letters in the reproduced section of the expert witness statement have been amended to reflect the naming conventions adopted through this report.

<sup>5</sup> Victorian Civil and Administrative Tribunal (VCAT), *BMF Construction Pty Ltd v Maribyrnong City Council*, VCAT Ref. P1647/2020, p. 18 (point 93).

<sup>6</sup> Victorian Civil and Administrative Tribunal (VCAT), *BMF Construction Pty Ltd v Maribyrnong City Council*, VCAT Ref. P1647/2020, p. 20 (point 109).

<sup>7</sup> C.G. Carlton, *Sunshine Cavalcade: Souvenir booklet commemorating the proclamation of the City of Sunshine*, p.76.

<sup>8</sup> Gary Vines, *Western Region Industrial Heritage Study*, 1989, unpaginated.

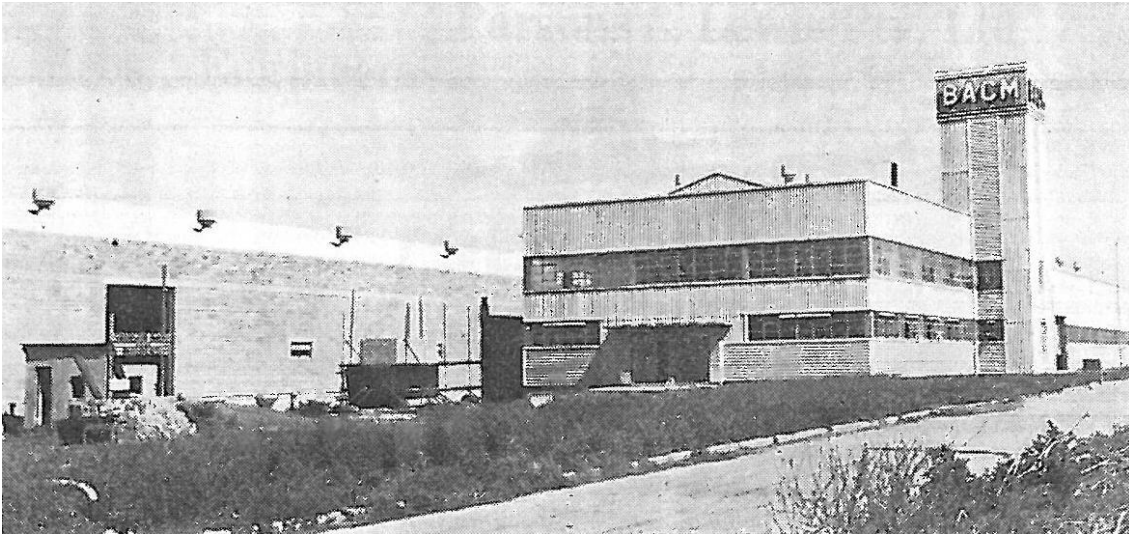


Figure 3 View of BACM office building (Building F), tower and warehouse (Building D) at left, c. 1951  
Source: Sunshine Cavalcade



Figure 4 1956 aerial photograph of the subject site; this shows similar development to the 1951 photograph above; Paramount Road is indicated at right, including the original form of the brick dye-house (Building E)  
Source: Landvic

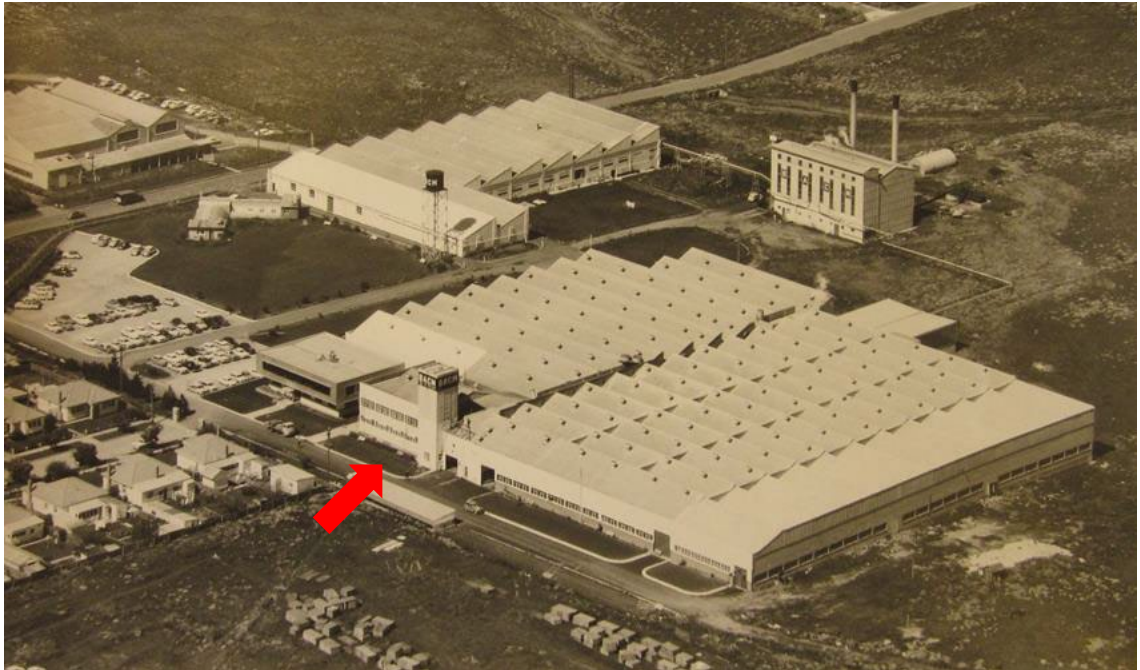


Figure 5 Oblique aerial photograph of the subject site c. 1961; the BACM office building and tower are indicated; the later adjoining administrative office building (east side) has also been constructed by this time; the boiler house with chimneys (since demolished) is at upper right while the brick dye-house to Paramount Road is at top middle.  
Source: State Library Victoria



Figure 6 1966 aerial photograph of the subject site  
Source: Landvic



Figure 7 1975 aerial photograph of the subject site; this shows the expansion of buildings on the west side of the site  
Source: Landvic



Figure 8 1991 aerial photograph of the subject site  
Source: Landvic

### 3.2 Description

The BCMA site is a large property located to the west of Paramount Road. The following is a description of the current buildings on the site within the HO extent of registration (Figure 9) as well as the section of the landscaping to the north and east of Building G.



Figure 9 Aerial of the entire site outlined in yellow, with buildings annotations and the extent of the HO outlined in red  
Source: Nearmap 2022, annotated by Lovell Chen

#### 3.2.1 Building B - Axminster Plant

Building B is a gabled warehouse building constructed between 1966 and 1975 (Figure 10). The warehouse is an extension of Building C. It has modern roof and wall cladding and albeit that the building is included in the Heritage Overlay, it has not been identified as having any heritage value.



Figure 10 South side of Building B (indicated), south side of Building C to right of image

### 3.2.2 Building C - Axminster Plant

Building C, is a large, corrugated metal clad building, with a sawtooth roof and face brick gable-end wall to the north part of the east elevation (Figure 11). It was originally used for manufacturing of carpets. As evident in the 1956 (Figure 4) and 1961 (Figure 5) aerial images it is one of several buildings which date from the first phase of development at the site (1949 onwards), however it has been substantially altered.

The original plans for the building (Figure 12 and the 1961 image at Figure 5), show a continuous band of horizontal glazing above an asbestos cement plinth to the north façade; the band complimented the windows to the adjoining BACM office building (Building F), as shown in Figure 3. The building was clad in corrugated asbestos cement cladding (see Figure 12). None of this detail remains following the construction of a new bay to the north c. 1966 (Figure 6), which now presents as a modern (window-less) metal clad façade (Figure 11). Figure 5 shows that by 1961 an extra bay had been added to the west end; an addition was also made to the south end in the 1960s. The roof has also been reclad and the original roof vents removed.

This building is included in the Heritage Overlay and is of some heritage value as one of the original manufacturing buildings on the site. However, its value has been significantly diminished by the replacement of external fabric, including the addition to the north, presenting it more as a utilitarian warehouse building. The original form and detailing of the north façade gave the building some distinction; the window band was also reflective of a manufacturing operation within, rather than warehousing or storage. It is noted that the Tribunal preference was for the retention of the northern parts of the Building C, including some of the saw-toothed bays as evidence of the original built form. As detailed above, this fabric is not original and does not provide evidence of the original façade.



Figure 11 North elevation of Building C with modern east gable end and cladding to the north elevation

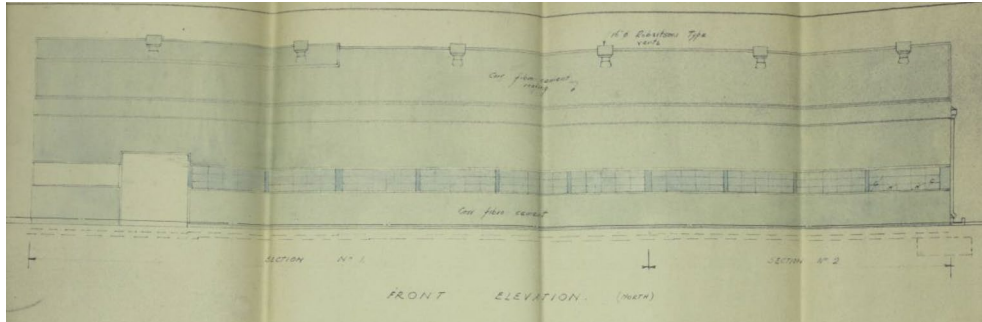


Figure 12 Front (north) elevation of building C, 1949  
Source: Public Records Office of Victoria

### 3.2.3 Building D - Wilton Plant

Building D is an over-painted concrete block, warehouse building, with a sawtooth roof and clerestory windows. It is one of several buildings which date from the first phase of development (1949) and is visible in the 1956 image (Figure 4). The building is located to the rear of the office buildings (Buildings F and G). The saw-tooth roof profile with clear storey windows, is evident on the long east elevation (Figure 13). The VCAT determination noted that total demolition of this building was considered acceptable as it is not as prominent as other building on the site (especially from the north).



Figure 13 Building D east elevation

### 3.2.4 Building E - Daylesford Woollen and Worsted Mills

Constructed c. 1949, the former dye-house of the BCMA is located along Paramount Road. It is a red brick building with a corrugated sheet sawtooth roof. To Paramount Road (east elevation) the building retains its face brick façade finish, with rendered detailing, and large steel-framed multi-paned industrial style windows, with hopper openings (Figure 14). An elevated Moderne style portico, with rendered bands, distinguishes the entrance to the building (Figure 15). The west, south and north sides have been progressively added to in an ad hoc manner. Although part of the 1949 works, the materiality and detailing contrast with other early buildings on the site. The original volume and its presentation to Paramount Road are considered significant elements. The rear and later additions (southern two bays) are not considered to have any heritage value. The eastern façade has various windows infilled and the sixth bay (from the north) has had the saw tooth profile altered.

The Tribunal determination noted that fabric visible from Paramount Road (8-10 meters) should be retained.



Figure 14 View from the southern end of the east elevation, showing multi-paned windows with alterations



Figure 15 View of the Building E sawtooth form from Paramount Road, entrance portico indicated

### 3.2.5 Office Building and tower (Building F)

The office/amenities building and tower (Building F) date to the late 1940s and are part of the earliest stage of development of the site (Figure 16). The office building is a two-storey block clad in corrugated asbestos cement vertical panels, with steel-framed windows in two continuous bands; the upper row is screened by metal louvers. The north elevation of the building has been partially concealed by extraneous elements, including a large fence and car port awning, but otherwise presents as substantially intact. The east elevation has been significantly modified following the construction of a c. 1980s link to the administration block (Building G). The associated integrated tower (incorporating a water tank within the upper portion) is also clad in vertical panels of corrugated cladding (asbestos), but with contrasting panels of horizontal elements. Although a structure of some utility, the tower is nevertheless unusually detailed and historically accommodated signage to the upper portion (Figure 3 and Figure 5).



Figure 16 View towards the north elevation of the tower with the administration building in the foreground

### 3.2.6 Administration building (Building G)

Designed by local Footscray Architects, R.F. Kneale & Associates, the administration block (Building G) was constructed between 1959 and 1961 (Figure 5). The two-storey building consisted of a recessed ground level which has a mosaic plinth and a row of aluminium strip windows. The first floor had a band of windows surrounded by vertical aluminium sheeting, with the windows on the north elevation covered by vertical louvres. A cantilevered canopy designated the glazed entrance lobby to the north (Figure 17).

At some date in the 1980s a linking element was constructed to the west, connecting Buildings G and F. The north side was also altered as part of the c. 1980s works with the original ground floor verandah infilled with glazing and the cantilevered entrance canopy was replaced (Figure 18). At ground floor, the east elevation, and east end of the north elevation, retain the original mosaic tiled plinth (Figure 19).

The north and part of the east sides of the administration block have raised (original) Castlemaine stone planters, surrounded by lawn / grassed areas. To the north the lawn gently slopes to the road, with a central concrete path to the main entrance. To the east the lawn is raised, with a cream brick retaining wall dividing, it from an asphalt parking area (Figure 19). This configuration is similar to that seen in the historical plans and 1960s aerial (Figure 17 and Figure 5)

The Tribunal determination addressed Buildings E, F and the tower together. This noted that total demolition was not supported and a depth of 6-8 meters of the office building (north and east elevations), including the ground floor architectural treatment to the east side as well as the full extent of the tower were to be retained.

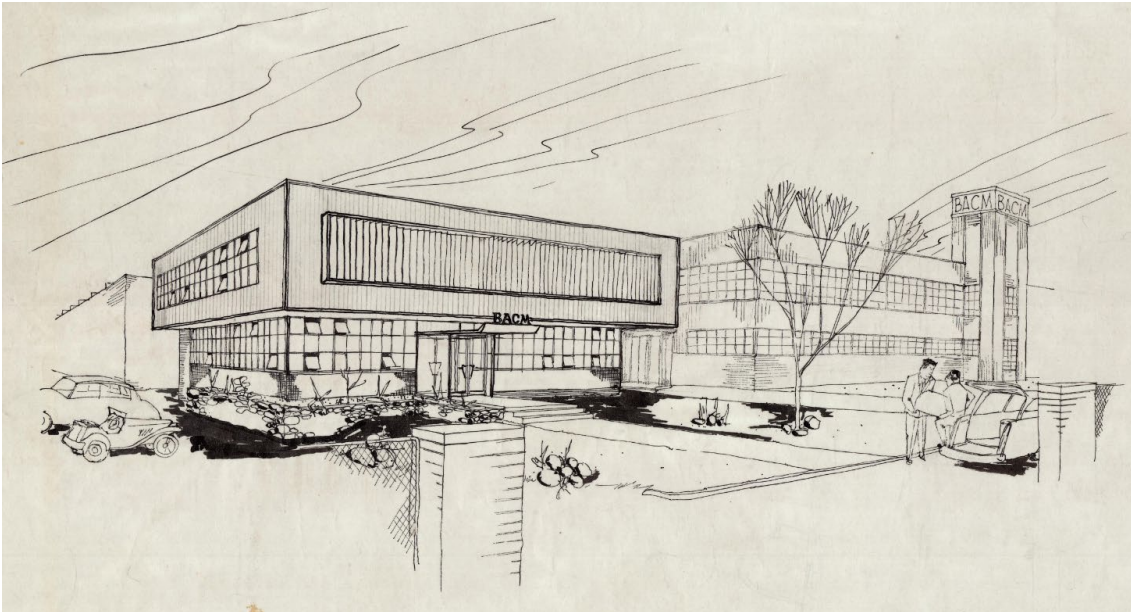


Figure 17 Perspective sketch of the administration building dating to 1959 illustrating the form of the building and the original landscape setting  
Source: Cowes Bay Group Pty Ltd archive, drawn by R.F. Kneale & Associates



Figure 18 North elevation of the administration block (Building G)



Figure 19 Detail of the mosaic tiling plinth, Castlemaine stone planters and brick retaining wall

### 3.2.7 Streetscape

The Pacific Carpets site is located immediately to the west of the intersection of Paramount Road, Dempster Street and Indwe Street. Paramount Road was designed to be used primarily by vehicles transiting to the urban centre of Tottenham, through an industrial zone, with little streetscape activation. The eastern side of Paramount Road has some street vegetation and paths, however, the nature strip immediately abutting the east of Building E is devoid of formalised footpaths and undeveloped for pedestrian use (Figure 9).

The area surrounding the site features a mix of land uses. Within the broader streetscape, the junction of Indwe Street and Paramount Road forms a discernible perimeter between residential zones to the north and the industrial zone, including the subject site, to the south. Accordingly, due to its location, the northern extent of the site and its prominent tower acts as a visual marker to indicate the transition between these zones.

The character of the buildings positioned immediately surrounding the site are largely industrial in nature and comprise a series of factory structures, mostly clad with corrugated sheet metal. The exception being the north-east side of the site and north of Indwe Street which has residences, many of which are included in the schedule to the HO (see Figure 2).

## 4.0 PROPOSAL

Overall, the proposed works to the site involve the demolition of various buildings, the retention of and conservation works to key structures of high heritage significance, and the construction of new contemporary warehouses. The proposed scheme has been substantially revised from that presented during the VCAT hearing (P1647/2020) and in large part reflects the VCAT findings (see Section 2.3).

It is also noted that the alphabetical labelling of the buildings in the proposed drawings (listed at Section 1) differs from that used in this document. Not all buildings are numbered in the proposed drawings, however, where applicable the reference is as follows:

| Lodged Drawings                        | Reference in HIS                               |
|--|--|
| New Building B1                        | Building B and Building C, and part Building D |
| New Building C including C1, C2 and C3 | Building E and area to the north               |

#### 4.1 Demolition

The proposed works include the demolition of several buildings to facilitate the redevelopment and modernisation of the site, see Figure 20.

Within the HO, Buildings B, C and D will be demolished to provide space for new construction. The existing amenities building and associated tower (Building F) are also proposed to be demolished to accommodate new structures on the site, noting that both buildings are substantially clad in asbestos cement sheeting.

Partial demolition is proposed to the former dye-house (Building E). The eastern portion of the building, with the exception of the southern two bays (later additions) is to be retained to the first column bay.

The administration building (Building G) will be retained in its entirety, with the western addition removed.



Figure 20 Aerial imagery with proposed demolition (red), rebuilds (yellow) and retained structures (green) indicated  
Source: NearMap

## 4.2 Works to existing structures

### 4.2.1 *Building E*

As noted above, the proposed demolition works include the demolition of the rear and southern two bays of Building E. The nine, original sawtooth bays presenting to Paramount Road will be retained to the first internal column line (12.4 metres). A new warehouse building with associated office is proposed to be constructed to the north and west of the retained fabric.

A suite of conservation works will be undertaken to the retained building volume. This includes reconstruction of the south façade (following demolition of later bays), repair and partial reconstruction of the north façade (following removal of modern attachments) and conservation/reconstruction works to the east façade and roof.

Obsolete mechanical services, and modern alterations (roller shutter doors, openings, infilled sections etc) are proposed to be removed and the fabric is to be repaired to match adjacent detailing (original presentation), where possible, utilising salvaged fabric. It is noted that the asbestos cement roof of the retained saw-tooths is proposed to be replaced with a modern galvanised steel roof sheeting. The existing flat roof of the Moderne style portico will also be refurbished, waterproofed and the rendered section repainted. The infilled original entrance will be opened up and new doors with sidelights installed.

### 4.2.2 *Administration building (Building G)*

The existing two-storey administration building (Building G) is proposed to be retained with a suite of conservation works undertaken to the façades. Following the demolition of the 1980s link structure to the west, the original west façade is proposed to be reconstructed. It is also proposed to reinstate the canopy to the north in accordance with the original drawings and historic images.

The planter boxes to the north and east façades are to be retained and new parking bays and an access ramp installed on the north side of the building.

### 4.2.3 *Tower (Building F)*

The proposed works include the demolition of the original water tower and its reconstruction. The reconstructed tower will be incorporated into the new building B1 (on the site of Building B and Building C). The tower will be reconstructed in the original location with all exposed external elevations matching as closely as possible the original treatment, noting that the original Super 6 asbestos cement sheet is to be replicated using an equivalent profile galvanised steel sheet (Stramit super six profile 0.55 BMT Galvabond).

## 4.3 New Works

The proposed new works within the extent of HO152 include the construction of two new large warehouse structures with associated office buildings and landscape works (driveways, loading areas and parking bays).

### 4.3.1 *Former Building B, Building C and part Building D (indicated as B1 on proposed plans)*

Following the demolition of Building B and Building C (former Axminster Plant) as well as Building D (Wilton Plant) a new warehouse and showroom building (B1 & B2) is proposed to be constructed. It is noted that only the portion to the north designated as Building B1 on the proposed plans falls within the

extent of the HO. As indicated above, the reconstructed tower will be incorporated into the north portion of the new building. The proposed warehouse building has been designed as a typical industrial warehouse building with a corrugated aluminium wall cladding (grey) and a low-profile gabled roof.

The north façade is divided into an east and west side, separated by the reinstated tower structure (Figure 5). The west side has been detailed to include a plinth with a 'brick look' and a row of strip windows referencing the original north elevation of Building C. Additionally, the upper section will comprise corrugated cladding placed vertically and horizontally obliquely referencing the saw tooth roof profile seen across the site and noted in the statement of significance. The gabled roof is pitched away from the reinstated tower, allowing it to retain its prominence within the site. The east side has been designed to reference the strip windows and materiality of both the former amenities/office building (Building F) and the retained administration building (Building G). The roof on this side is a flat roof and abuts the tower as a lower level, revealing the upper portion of the tower to a greater degree.

#### *4.3.2 Building E (indicated as Building C including C1 and office on proposed plans)*

It is proposed to construct a new warehouse to the rear and north of the retained portion of the sawtooth building, this is identified as Building C on the plans. The new structure will be predominately rectangular in shape with a low-profile gable roof. The external façades will have a concrete plinth and grey vertical cladding to the upper levels. The building will be set back 12.4 metres from the east façade of the retained Building E. The roof ridge of the new building will be around 5.5 metres higher than the top of the retained sawtooth roof.

Two smaller structures are proposed to be attached to the north side of the new warehouse. The single storey, east building will be set back in line with the new warehouse and reference the retained sawtooth building, through the use of red brick and metal cladding to the east façade. Concrete and vertically placed Colorbond corrugated steel cladding are proposed to the north and west sides. The west building (caretaker's office) will be in line with the west edge of the new warehouse, it will be double storey, albeit lower than the proposed warehouse building and clad in the same grey corrugated steel cladding as the warehouse.

#### *4.3.3 Landscaping*

New landscaping is proposed across the site, to accommodate the industrial use, allowing trucks to enter and leave the site, as well as to facilitate parking and stormwater runoff. Large areas are proposed to be concrete hardstand (to allow truck movement) and asphalted where lightweight vehicles will transverse or park. The areas around the periphery of the site and will include grassed or planted sections.

The gates to Sredna Street are to be retained and secured in a closed position and the area to the south of the gates is to be landscaped. This landscaping (six metres wide) will extend along the north boundary and have trees as well as smaller plants. A three metre high screen is proposed to extend from the east gate post of the Sredna Street entrance to Paramount Road.

## **5.0 ASSESSMENT OF HERITAGE IMPACTS**

### **5.1 Heritage policy framework**

The property is subject to the Heritage Overlay and accordingly the following assessment has had regard to the heritage provisions, including the relevant decision guidelines and policy forming part of Clause 22.01 'Cultural Heritage Policy' and Clause 43.01 'Heritage Overlay' of the Maribyrnong Planning

Scheme. It is noted that the property is within an Industrial 3 Zone and that the 'Industrial Heritage Policy' at Clause 22.01-16 is applicable. The statement of significance for the former Pacific Carpets (HO152) has also been referred to, as the relevant reference document to Clause 22.01.

In introducing the *Industrial Heritage Policy* (cl. 22.01-16) the relevant policy basis is as follows:

#### Policy basis

A dominant theme in the development of Maribyrnong since the mid-nineteenth century has been the development of industry and some of Victoria's most significant industrial heritage is now found within the city. Meat and meat product processing, engineering, munitions and armaments, have been dominant industries in Maribyrnong over long periods of time.

The Maribyrnong Heritage Review 2001 has identified a wealth of industrial heritage in the area, which includes places that are no longer used for their original purpose and have been redeveloped such as the former Barnett Glass Rubber Factory, to complexes such as Sugar Australia which continue processes which originally commenced more than a century ago.

Conservation policy and practice is needed to protect and promote industrial heritage in a context of rapid change occurring at industrial sites throughout the municipality.

The conservation of industrial heritage places presents specific management issues. It is often the use of the site for the same purpose over a long period that is of the primary historical significance. While fabric such as buildings or plant may contribute to the significance of industrial heritage places by illustrating the development of the place over time, the ongoing replacement and upgrading of this fabric is often an integral part of the operation of the use. 'Conservation by use' is an important heritage principle and on this basis, there may be circumstances where it may be appropriate to permit the removal or alteration of fabric if it will facilitate the historic use of a site and ensure future viability.

Recognising the relevant policy basis this proposal is one which is directed at reusing the existing site for warehousing and related industrial purposes in place of the now defunct carpet manufacturing operations. As for many such sites the existing buildings on the site were essentially enclosures for production plant, all of which has been removed. In this regard the built form evidences a former large scale industrial use, but sheds little if any light on the nature of that use. In delivering a heritage outcome for such a place, where much of the fabric was focused on function rather than aesthetic form, the approach is one which seeks to retain elements which are of a more visually distinctive nature and assist in telling the story of the site over time.

Addressing the policy objectives the approach is one which provides for partial conservation of heritage fabric on the site, including active restoration and reconstruction, and provides for a new industrial use which will maintain the visual scale of the place.

## 5.2 Assessment of heritage impacts

### 5.2.1 Demolition

As relevant to demolition Clause 22.01-16 'Industrial Heritage Policy' indicates that it is policy that:

- An appropriate record be made of any significant fabric that is proposed to be removed or demolished. This may include a photographic survey and measured floor plans and elevations. All recordings must be of archival quality.
- Whether the proposed buildings, works or demolition will advance policies and objectives of the planning scheme in terms of the ongoing use and development of land for industrial or port-related purposes.
- Whether the proposed buildings, works or demolition will support the viability of a new industrial use on the site.
- Whether demolition will, when balanced against other policies and objectives, achieve a net community benefit.
- Whether the demonstrated level of contamination prevents, or makes prohibitive, the repair, adaptation or re-use of a significant building or place.

The decision guidelines at Clause 43.01 'Heritage Overlay' note the following in relation to demolition:

- Whether the demolition, removal or external alteration will adversely affect the significance of the heritage place.

## COMMENT

### *Building E*

The proposed demolition works to Building E involve the removal of the large open floor plan factory area behind the red brick presentational façade to Paramount Road and the three added bays at the south end of that façade. The works retain 12.4 metres depth of building on Paramount Road ensuring that the three dimensional form of the early factory building can be observed and understood, including the saw tooth roof. The fabric to be removed is a composite structure which reflects the pragmatic growth and expansion of the original building. It is illustrative of the growth of the complex over time but is otherwise without distinction as compared to other buildings on the site. The proposed demolition will enable new development to occur, behind the retained heritage fabric, providing for the new viable use of the site.

Additionally, the approach is one which presents as consistent with the expert evidence of Ms Brady and the determination of the Tribunal (VCAT Reference No. P1647/2020) on the previous application.

### *Building F & G*

The proposed demolition works for Building F involve the complete removal of this structure and reconstruction of the water tower and an interpretative structure in its place. The existing structure is clad in part both externally and internally with asbestos cement sheet. Additionally, the upper surface of the ceiling linings beneath the asbestos cement sheet roof has been found to contain asbestos dust which has been determined to be friable.<sup>9</sup> The recommendations of the Division 6 report is that the dust must be removed and that if the sheet materials are likely to be disturbed in the course of future works, they also should be removed. Given the expectation that in the event of refurbishment of the

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<sup>9</sup> Identifibre Pty Ltd, Division 6 Demolition/Refurbishment Asbestos and Hazardous Materials Survey and Risk Assessment, Paramount Road Site, 36-65 Paramount Road, Tottenham, 15 August, 2019, pp. 21-22.

existing building and adjacent development disturbance is inevitable, the determination reasonably has been to remove the building.

In doing so the heritage loss is recognised and it is proposed to rebuild the tower as a copy of the existing, matching the detailing as closely as possible. Additionally, a new structure to the east side of the tower is proposed as an interpretation of the original amenities and office building. In responding in this manner the approach recognises the importance of this first amenities and office building as noted in the statement of significance of the place:

The unique use of corrugated cladding in this up-to-date Modern composition gives the building a special position in the evolution of industrial architecture in the region and with the prominent tower, is a local landmark. (Criterion F1)

Albeit not consistent with the expert evidence of Ms Brady and the determination of the Tribunal (VCAT Reference No. P1647/2020) on the previous application, the specific issue of the hazardous materials was not addressed at the time. Additionally, the focus of Ms Brady's assessment was on the tower, whereby she commented 'total demolition is not supported with the tower to be fully retained.'<sup>10</sup> The rebuilding of the tower will go some way to mitigate this localised heritage loss.

By way of wider mitigation of the loss arising in the case of Building F is the proposed retention and external conservation of the later administration building, Building G. The demolition works associated with this building are directed at removal of later additions and external alteration. The outcome will be one which reinforces this area of the site in evidencing the earlier structures associated with the carpet manufacturing history of the place. The outcome is one which is consistent with and exceeds the preferred outcome of Ms Brady and the Tribunal.

#### *Building D*

The proposed works include the demolition of Building D. Building D, although an early structure on the site, and consistent in design to this early phase, is not readily visible from the public realm. Its demolition will have no impact on the overall assessed significance of the site and the proposed demolition is considered acceptable. This is consistent with the Tribunal findings.

#### *Building C*

It is proposed to demolish Building C and replace it with a new warehouse facility. On the north-east corner the new structure will incorporate the rebuilt water tower, as noted above. As indicated at Section 3.2.2, the northern portion of this building was altered and does not present as originally constructed. The proposed works will result in the loss of some original fabric (located internally towards the centre of the building) and the later front facade.

Unlike other buildings on the site Building C is set deeply into the complex and is not readily visible from the public realm. The proposed demolition, however, will result in the further reduction in the structures which evidence the traditional saw toothed roof construction. In mitigating this loss the north facade of the new warehouse has been designed as an interpretation of the original facade with a low brick-like plinth and continuous strip of glazing. As noted the gable end further references the saw toothed roof profile in the cladding design in the upper facade.

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<sup>10</sup> VCAT, MBMF Construction Pty Ltd and Maribyrnong City Council, 20 May 2021, VCAT Reference No. P1647/2020, p. 11.

Ms Brady's advice to the Tribunal on the previous application was that partial demolition of the building could occur albeit that replacement of this building was not before the Tribunal at the time. In commenting on her evidence more generally the Tribunal noted:

Her [Ms Brady's] evidence was that it is the most publicly visible elements, that are visible from the most prominent public realm vantage points that should be retained.<sup>11</sup>

In considering this remark, Building C is a structure which is well removed from both Paramount Road and Sredna Street and its public exposure is limited. The impact of the loss of such a structure, recognising the alterations to the front façade presents as relatively minor in this context.

### 5.2.2 Alterations and New Works

As relevant to alterations and new works Clause 22.01-16 'Industrial Heritage Policy' indicates that:

- Preference will be given to applications for development that:
  - Support the continued viability of the historic industrial use of the site.
  - Seek to achieve a balance between the achievement of conservation objectives and other relevant planning scheme policies, and objectives in relation to economic viability and occupational health and safety.
  - Where possible, conserve fabric considered to be of primary significance unless the fabric has been made redundant and must be replaced by new buildings, plant or equipment associated with an ongoing or new industrial use, or its retention is outweighed by other more important policy outcomes.
  - Retains redundant fabric of primary significance in-situ if there is no immediate need to remove or relocate it.
- Whether any proposed interpretation will provide adequate information about the historic use and development of the site, including any significant links with other related industrial, commercial or residential places.

It is also noted that the policy states the following in relation to a site where a use is discontinued, and a site redeveloped:

- Creatively interprets the history of the heritage place through the design or layout of new development including buildings, subdivision, landscaping, movement systems and public art.

The following relevant clauses are included in the decision guidelines at Clause 43.01 'Heritage Overlay' which notes the responsible authority must consider as appropriate:

- The significance of the heritage place and whether the proposal will adversely affect the natural or cultural significance of the place.
- Any applicable statement of significance (whether or not specified in the schedule to this overlay), heritage study and any applicable conservation policy.
- Whether the location, bulk, form or appearance of the proposed building will adversely affect the significance of the heritage place.

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<sup>11</sup> VCAT, MBMF Construction Pty Ltd and Maribyrnong City Council, 20 May 2021, VCAT Reference No. P1647/2020, p. 13.

- Whether the location, bulk, form and appearance of the proposed building is in keeping with the character and appearance of adjacent buildings and the heritage place
- Whether the proposed works will adversely affect the significance, character or appearance of the heritage place.

**COMMENT**

The proposed alterations and new works have been designed to reference the retained structures on the site and to respond to the need to support the functioning of the site for contemporary industrial purposes, in-line with its historical use. Where appropriate fabric of significance has been retained and integrated into the new development including active conservation works.

The approach is one which seeks to find a balance between the need to conserve heritage fabric while additionally accommodating change to facilitate and support adaptive industrial reuse. It is an approach which is consistent with relevant heritage policy for industrial sites and where loss occurs seeks to mitigate that loss.

*Building E (indicated as Building C including C1 and office on plans)*

The proposed new building to the north and west of the retained Building E has been designed as a simple rectangular structure, clad in a grey metal finish. Albeit that the new structure is larger than the demolished building, it presents as a backdrop to the retained red brick sawtooth structure, allowing it to maintain its prominence on Paramount Road (Figure 21). With a setback of 12.4 metres from the east façade, the volume and form of the original structure will readily be understood when viewed from the north and south along Paramount Road.

The lower structures proposed to the north side of the new building have been designed as modern interventions within this section of the site; with the east elevation incorporating brick elements as well as grey metal cladding, referencing the original structures on the site. The lower buildings are set back a considerable distance from the retained fabric of Building E (30 metres further north and 12 meters west) allowing them to contribute to the overall setting of the site without competing with the retained structure.

In an historical context this area contained earlier structures (see Figure 4 to Figure 8) and the new built fabric to the north of the retained fabric of Building E is reflective of the historical development of the site.

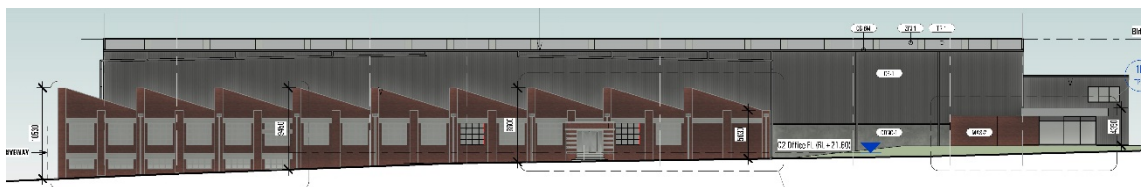


Figure 21 Proposed east elevation of new Building C and C1 as well as retained section of Building E  
Source: Qanstruct, TP32, 2022.10.18, Revision B

*Administration Building (Building G)*

The proposed reconstruction and conservation work to the administration building will result in the structure presenting as originally constructed (Figure 17). Further, the proposed landscape works, albeit modified from the original, will maintain the overall 1950s landscape presentation as indicated at Figure

17. Overall the proposed works to the administration building and the surrounding landscape are strongly positive from a heritage perspective and will reinforce the ability to understand the site as a heritage place when viewed from Paramount Road and Sredna Street.

*Former Building B, Building C and part Building D (indicated as B1 on plans)*

As indicated at Section 4.2.3 it is proposed to demolish the existing Buildings B, C and D, the tower and the office/amenities building (Building F) to accommodate a large warehouse (Building B1) on this section of the site.

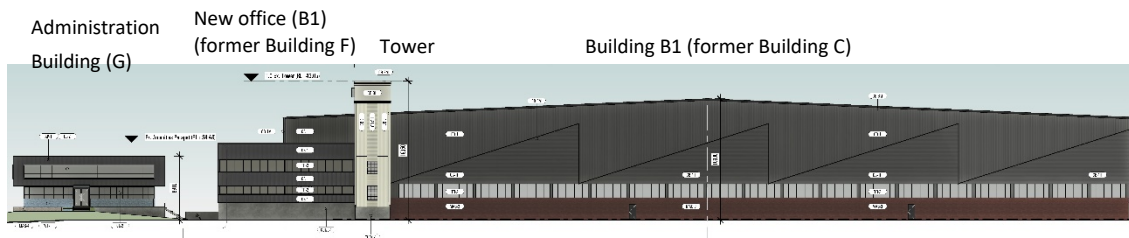


Figure 22 Proposed north elevation of existing administration building, new office, tower and Building B1

Source: Qanstruct, TP22, 2022.10.18, Revision B

The new building has a modern aesthetic, allowing it to be understood as a new intervention within the site. Recognising the significance of the existing structures the new building (B1) has been carefully designed and detailed in response to the overall industrial and historical aesthetic of the site. As indicated at Figure 22 the north façade incorporates a new office component which references the demolished Building F and forms a visual link to the retained administration building (Building G). The reconstructed tower will ensure that the landmark element is maintained within the site and the western side of the façade has been designed to reference the site detailing (saw-tooth roof) and the original materiality (brick plinth, strip windows, metal cladding) of the 1949 elevation (see Figure 12). While of contrasting scale, the visual impact of the new warehouse space is moderated by the inclusion of the smaller scale and reconstructed elements on the north-east corner. As approached or seen from the Paramount Road entry there will be an ability to understand the nature of the smaller scale structures which were associated with the carpet manufacturing establishment.

*Site recording and interpretation*

As relevant to actions to in part mitigate impacts and to respond to the challenges of the adaptive reuse of such sites, the relevant Industrial Policy at cl. 22.01-16 includes reference to site recording and interpretation activities. The policy notes that it is policy that:

- An appropriate record be made of any significant fabric that is proposed to be removed or demolished. This may include a photographic survey and measured floor plans and elevations. All recordings must be of archival quality.
- When a use is discontinued and a site redeveloped, preference will be given to applications for new development that:
  - Retains as much significant fabric as possible;
  - Creatively interprets the history of the heritage place through the design or layout of new development including buildings, subdivision, landscaping, movement systems and public art; and

- Incorporates interpretation of the heritage place, and the place within its context. This may include interpretative signage that outlines the history of the site and may include text, images or maps.

In response to these policy initiatives it would be desirable that prior to works commencing that an archival photographic record of the external and internal fabric of the key heritage buildings be prepared and lodged as hard and/or soft copy with a suitable local repository. The buildings to be documented in this manner would comprise the Paramount Road factory, Building E, the original office/amenities building including the tower, Building F and the later administration office building, Building G.

In addition, it is recommended that a site interpretation plan be prepared and implemented to inform future users of the place about the history and use of the site. Given the expectation that public access to the site would be limited such interpretation should include installations at the principal entry points. Given the challenging physical environment any interpretation will need to be robust in construction and able to be easily maintained.

Implementation of both of these actions is a matter which could be addressed by way of permit conditions.

### *Landscaping*

As seen in the historical images at Figure 4 to Figure 8 the landscape response to the site over time has in large part been a pragmatic one which gave primacy to vehicle movement and parking. Those areas which were not hard stand present as open grassed spaces with formal raised kerbing. Reflecting the importance of the Sredna Street entry the only formalised landscape appears to be that extending across the northern front of the complex (Figure 5). This was further enhanced in a localised manner around the base of the new administration building.

The proposed roadway and landscape response to the site largely is consistent with the historic treatment recognising that much of the site area will continue to be occupied by roads and parking areas. Localised planting and hedging are proposed with a limited reinstatement of the more detailed planting which existed around the administration building. No active reconstruction of landscape is proposed and the approach is one which is modest in extent, consistent with the traditional response to such establishments.

Overall, the proposed landscaping across the site is in keeping with the historical use and industrial sites in general. The works will have no impact on the overall assessed significance of the place.

## **6.0 CONCLUSION**

The proposed redevelopment of 35-65 Paramount Road, Tottenham, has been carefully designed and incorporated into the site so as to be sympathetic to the original design intentions, including the distinct and unusual architectural forms. The proposed works support the viability of a new industrial use on the site, while retaining the assessed heritage significance of the place and views of the site from the public realm. Noting the past determination of the Tribunal on an earlier proposal, the revised approach in large part responds to the issues raised in that decision and provides a more balanced physical outcome where the imperative to deliver large format warehousing has been better integrated with heritage fabric retention and/or reconstruction. Combined with archival recording and interpretation deliverables, the outcome is one which will maintain the ability to understand the heritage nature of the place and to maintain its heritage significance.

