

01 March 2017

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

Re: Registration Hearing Submission—Shell House, 1 Spring Street, Melbourne 3000

Dear Mr Welch

The National Trust of Australia (Victoria) supports the Executive Director's recommendation to add Shell House to the Victorian Heritage Register.

The significance of the place at the State Level has been clearly outlined in the nomination to Heritage Victoria prepared by Jon Hickman (with accompanying expert advice from Helen Lardner for HLCD Pty Ltd), and in the subsequent Assessment of Cultural Heritage Significance and Executive Director Recommendation to the Heritage Council.

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 VHR 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 Executive Director's recommendation that Shell House satisfies the basic criteria for Criterion D as 'an office tower which has clear associations with late twentieth century International style architecture' (pg.5). We also agree that this architectural style has made an important contribution to design in Victoria, and that these principals characteristics are clearly evident in the highly intact fabric of Shell House. The range of interior and exterior images provided by the Executive Director as an accompaniment to his recommendation support this assertion (figures 1-4).



Figure 1: Conference centre level foyer (Source: Heritage Victoria)



Figure 2: Light well from conference centre (Source: Heritage Victoria)

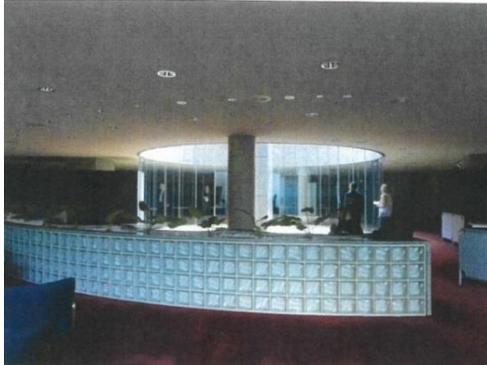


Figure 3: Cafeteria and light well, mezzanine level (Source: Heritage Victoria)



Figure 4: Executive level 28, garden court (Source: Heritage Victoria)

The basic test for determining State Level significance for Criterion D is the requirement that the place is a notable example of its class in Victoria. The Executive Director has clearly outlined the multitude of ways that Shell House reaches the threshold for State Significance. The National Trust submits that Shell House is a notable example of the International Style in Victoria, incorporating ‘the Modernist ideas of simplicity of form and use of geometry’, and clearly reflecting ‘these ideals in the building’s clear expression of structure and lack of adornment’ (pg.5). The ED further outlines that Shell House represents an ‘innovative design response to a difficult site,’ including the ‘clever integration of dramatic level changes for public access from surrounding streets through a central control point (pg.5).’ As further indicated in the nomination prepared by Jon Hickman, with expert advice provided by HLCD Pty Ltd, Shell House was awarded the Royal Australian Institute of Architects Victoria Merit Award in 1991, and the National RAI Award in the same year. This recognition and acknowledgement further reinforces the cultural heritage significance of Shell House, specifically in reaching the threshold for Criterion D.

Further, as outlined in the ‘Comparative Analysis’ section of the ED’s recommendation, Shell House is the ‘only example in Victoria of Seidler’s important series of office tower designs’, and there is currently no other building ‘presently included in the VHR which can be compared to Shell House’

(pg.19). For the reasons outlined above, the National Trust submits that Shell House satisfies Criteria D at a State level.

Criterion E: Importance in exhibiting particular aesthetic qualities

The basic test for satisfying Criteria E is determined by the extent to which the physical fabric of the place exhibits particular aesthetic characteristics. The National Trust supports the recommendations made by the ED that Shell House clearly exhibits ‘important sculpture qualities which are created by the interlocking curvilinear form of the building and by elements as the large tapered pier at the Spring Street/Flinders Street entrance (pg.7).’ The ED further notes the contribution of:

the large scale artworks which complement the architecture of the building and were designed specifically for Shell House. Significant pieces include the foyer mural ‘Bathers and Pulpit Rock’ by Arthur Boyd (1988), and the external plaza sculpture ‘Shell Mace’ by Charles O Perry (1989). (pg. 7)

An array of images published by The Design Files in February 2016¹ emphasis the particular aesthetic qualities of the artworks by Boyd and Perry as they relate to Shell House (figures 5-6).



Figure 5: Arthur Boyd’s mural ‘Pulpit Rock, Bathers and Muzzled Dog’ in the foyer of Shell House. Photo – [Sean Fennessy](#) for The Design Files.



Figure 6: Charles Perry’s sculpture ‘Shell Mace’ at Shell House. Photo – [Sean Fennessy](#) for The Design Files.

¹ Harrison, Stuart (2016) *Shell House*, [accessed online]: <http://thedesigntfiles.net/2016/02/shell-house/>

The National Trust further submits that the large tapered pier at the Spring Street/Flinders Street entrance is an artwork in itself, with high aesthetic qualities (figure 7).



Figure 7: profile of the tapered pier at the Spring Street and Flinders Street entrance, photograph by Helen Lardner (25 October 2016)².

The basic test for determining State Level significance for Criterion E is the requirement that these aesthetic characteristics are appreciated or valued by the wider community or an appropriately related discipline as evidence by: critical recognition of the aesthetic characteristics of the place within a relevant art, design, architectural or related discipline as an outstanding example within Victoria. The ED has acknowledged the appreciation of Shell House by a number of architectural critics, including British critic Kenneth Frampton and Australia critics Philip Draw and Jennifer Taylor (pg.7). The National Trust further supports the ED's acknowledgement of the 'exception merit' of Artists Arthur Boyd and Charles O Perry 'in the fields of painting and sculpture respectively' (pg. 7). For the reasons outlined above, the National Trust submits that Shell House satisfies Criterion E at a State level.

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

While the ED has not recommended that Shell House reaches the threshold for Criterion F, the report notes that Shell House is significant for the following technical reasons, but not at a State Level:

Shell House has a number of technical innovations incorporated into the building. These include the clever repetition of clear span beams of equal length for the floor construction system; the provision of 250mm of access space for services between floors; thermally efficient design with low operating costs, including energy efficient daylight sensors that monitor the sunlight and worked with motion detectors to turn office lights on and off; and an extensive advanced access control system. It was the dual winner of the 1989 Building Owners and Managers Association award for design and the American Society of Heating, Refrigerating, and air conditioning Engineers and Association of Consulting Engineers of Australia awards for mechanical design. (pg.5-6).

For the reasons outlined by nominator Jon Hickman, supported by expert evidence prepared by Helen Lardner for HLCD Pty Ltd, and for the reasons specified by the ED (included above), the

² HLCD Pty Ltd, Shell House: Heritage Assessment Report (prepared for Jon Hickman Strategy and Implementation), October 2015

National Trust submits that Criterion F may be satisfied at a State level, and that this should be tested during the Registration Hearing by the Heritage Council.

Criterion H: Special association with the life or works of a person, or group of persons, of importance in Victoria's history

The ED has not recommended that Shell House reaches the threshold for Criterion H, yet specifically notes the following (as part of the recommendation for Criterion D):

Seidler is considered to be one of the major talents in Australia architectural history who made a substantial contribution to Australian architecture by continuously exploring skyscraper design. (pg.5).

Further, as part of the 'History of the Shell company' section, the ED specifically notes the following:

The aspirational nature of the new building at this time was reflected in the appointment of notable architect, Harry Seidler, for the design. At the time he was a highly regarded commercial architect and leading Australian Modernist. (pg.11)

As part of 'Modernism', the ED notes the following:

Harry Seidler was Australia's best known practitioner in the modernist style. He continued to produce a steady stream of uniformly high quality work from the 1950s through to the 1990s. (pg.12)

And finally, as part of the section on Harry Seidler, the ED also specifically notes the following:

Throughout his career, Harry Seidler was also a writer, photographer, teacher and a supporter of the arts. He was an outspoken advocate of the architectural profession and was recognised both nationally and internationally for his work.

Seidler made a strong and influential contribution to architecture in Australia, particularly through his continual exploration of skyscraper design. Seidler is considered to be one of the major talents in Australian architectural history and a leading figure in Australian architecture throughout his long career from the late 1940s until his death in 2006. His contribution has been acknowledged by the receipt of a number of awards for his work. Shell House remains highly intact to clearly indicate the association between the architect and the place. (pg.13)

The significance of Harry Seidler is further outlined in detail by Helen Lardner of HLCD Pty Ltd in the Heritage Assessment of Shell House through the acknowledgement of the following:

[Seidler] was made a Life Fellow (1970) and received 50 awards from the Royal Australian Institute of Architects (RAIA) for his work, including five Sulman Medals, four Wilkinson Awards and the Gold Medal in 1976... He was awarded Australia's highest honour, the Companion the Order of Australia in 1987. (pg.5)

While the significance of Harry Seidler is acknowledged by the ED in the recommendations for Criterion D, the National Trust submits that Criterion H should also be tested by the Heritage Council through the Registration Hearing process.

Extent of Registration and Curtilage (as recommended by the ED)

The National Trust supports the ED's recommendation of the following:

The extent of registration of Shell House in the Victorian Heritage Register affects the whole place shown on Diagram 2365 including the land, the building (including the interiors and exteriors), trees, landscape elements and other features. (pg.2)

Further:

*All of the land identified in Diagram 2365 is of **primary cultural heritage significance**. The retention of the following is encouraged (pg. 8) [Our emphasis]*

The National Trust strongly supports the specific internal and external features as specified by the ED (pg.9-10):

Internal:

- The main Spring Street foyer, including the mural *Bathers and Pulpit Rock*.
- The mezzanine level area.
- The Flinders Street entry foyer and stairs.
- The former staff cafeteria accessed at the mezzanine level.
- The Flinders Lane foyer and conference centre level (including corridors, theatrette and meeting rooms)
- The vertical lift core including all lifts and each floor foyer.
- The spiral staircase that connects Levels 27 and 28
- The open, light and spacious interior aesthetic created by the uniform 15 metre wide column-free space from the services core to the external windows.

External:

- All external plazas.
- The Spring/Flinders Street plaza sculpture 'Shell Mace' by Charles O Perry.

The high level of intactness and integrity of materials is a key element contributing to the cultural heritage significance of Shell House, as clearly outlined through the ED's recommendation that the place satisfies Criterion D at a State Level. As such, the National Trust firmly submits that any proposals to alter or remove internal or external features of Shell House should be subject to a Heritage Permit as determined by Heritage Victoria.

Proposed permit policy and exemptions

The National Trust further submits that the permit policies and exemptions as recommended by the ED suitably address the cultural heritage significance of Shell House and should be approved by the Heritage Council as outlined.

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