

15 May 2017

Mr Damien Welch  
Hearings Coordinator  
Heritage Council of Victoria  
PO Box 2392  
Melbourne VIC 3000

**Re: The Former Commonwealth Note and Stamp Printing Department, 115 Victoria Parade, Fitzroy**

Dear Mr Welch,

The National Trust of Australia (Victoria) supports the Executive Director's recommendation that the Former Commonwealth Note and Stamp Printing Department building should be included as a Heritage Place in the Victorian Heritage Register under the *Heritage Act 1995*.

The significance of the place at the State Level has been clearly outlined in the nomination of the place to Heritage Victoria, 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 A: *Importance to the course, or pattern, of Victoria's cultural history***

The basic test for satisfying Criterion A is for the place to have a clear association with an event, phase, period etc. in Victoria's cultural history, for this association to be evident in the physical fabric of the place, and for this event, phase etc. to have made a strong or influential contribution to Victoria. As clearly outlined by the ED, the place has a 'clear association with the important process of designing, printing, manufacturing and issuing all legal tender, stamps and other government security products for Australia and its overseas territories' and is an 'important reminder of the establishment of an official Australian currency, which contributed to a sense of national identity in the early decades of the twentieth century' (page 7).

Further, the ED clearly demonstrates this significance at the State Level, noting that there are 'few other places in Victoria, indeed in Australia which have substantially the same association as the Commonwealth Note and Stamp Printing Department', and that 'while other Commonwealth Government buildings were constructed during this period, no others are associated with the task of producing the Australian government's secure products' (page 8).

For the reasons outlined above, the National Trust strongly supports the ED's recommendation that the place reaches the threshold for Criterion A at the State level.

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

The basic test for satisfying Criterion B is for the place to have a clear association with an event, phase etc. of importance in Victoria’s cultural history, for this association to be evident in the physical fabric of the place, and for this significance (whether it be the place itself, an unusual feature/s, and/or the very existence of the class), to be rare or uncommon. To test whether this significance reaches the threshold for state level significance, these values need to be rare, uncommon and/or endangered within Victoria. The National Trust strongly supports the ED’s assessment that the places easily meets the threshold for Criterion B at the State level ‘as the only place purpose built for the design, manufacture and issue of bank notes, stamps and other secure government products for use in Australia and nearby territories,’ and as ‘one of only three places in Victoria (Australia) where note printing took place’ (page 9).

For the reasons outlined above, the National Trust strongly supports the EDs recommendation that the place reaches the threshold for Criterion B at the State level.

**Extent of Registration and Rationale for Extent**

The National Trust support’s the ED’s proposed Extent of Registration for the building as follows:

‘The extent of registration of the Former Commonwealth Note and Stamp Printing Department in the Victorian Heritage Register affects the whole place shown on Diagram 2372 including the land, all buildings (including exteriors and interiors) and other features (page 3).

Further, the National Trust supports the ED’s rationale that the extent of registration should include the entirety of the cadastral block that was acquired for use by the Former Commonwealth Note and Stamp Printing Department in stages between 1919 and 1961.

**Proposed Permit Exemptions and Permit Policy**

The National Trust further submits that the permit policies and exemptions as recommended by the ED suitably address the cultural heritage significance of the place 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. As clearly demonstrated by the nominator, and supported by the additional research and assessment undertaken by the ED, the place unquestionable reaches the threshold for State level significance in Victoria. The role that this building played in the development of Victoria’s cultural history demands that its future preservation and development be assessed under the provisions as set out in the *Heritage Act 1995*. Should you have any queries regarding the above, please contact me on 9656 9837.

Kind regards,



Felicity Watson  
Advocacy Manager